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NO. _____

In The
UNITED STATES SUPREME COURT

CHIVALRY FILM PRODUCTIONS and JOSEPH ARDITO Individually,

Petitioner,

-v-

NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED, UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC, UNIVERSAL CITY STUDIOS LLLP, UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. D/B/A DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM, NANCY TENENBAUM FILMS, INC., TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, AND JAY ROACH D/B/A EVERYMAN PICTURES,

Respondents,

On Petition For WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS For the SECOND CIRCUIT

PETITION FOR WRIT OF CERTIORARI

Pro Se: **Joseph Ardito**
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QUESTIONS PRESENTED

I.

Whether a plaintiff in a copyright infringement case involving Stolen Federal Copyright clearly demonstrates access and overwhelming Characters, Scenes, and Settings that actually proves copying and plagiarism had occurred would he be entitled to discovery?

II.

Whether plaintiff in these proceedings is entitled to start anew due to a retained attorney who assisted in formulating said complaint against the defendants and had intentionally tried to sabotage the proceedings due to his involvement and interest in the outcome?

III.

Whether the Civil RICO in this case can be re-instituted against the defendants due to frauds perpetrated by defendants throughout these legal proceedings by the intentional tampering of federal evidence and perjured affidavits used to manipulate and distort the outcome of said proceedings?

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STATEMENT OF JURISDICTION

This is a direct appeal from a judgment of the United States Court of Appeals for the Second Circuit dated October 4th, 2007. There is no order respecting a rehearing, and no extension of time to file present petition for writ of certiorari has been filed.

The jurisdiction of this court is invoked pursuant to 28 U.S.C. Petitioner, Section 1254(1).

Rule 29.6 Statement

Petitioner, Chivalry Film Productions is a sole proprietorship duly organized existing under and by virtue of the laws of the State of New York, County of New York, Joseph Ardito is the sole owner of plaintiff Chivalry Film Productions.

Statutory Provisions Involved

Federal Copyright Act of 1976, as amended 17 U.S.C.A. Section 101. et seq, 28 U.S.C Section 1367, Racketeer Influence and Corrupt Organization (R.I.C.O.) pursuant to Title 18 U.S.C. (c)-(a) Federal Wire Fraud, (b) Federal Mail Fraud. 28 U.S.C. Section 1391 (b) and (c) and 1400 (a), under 15 U.S.C. Section 1125 (a) and Section 43 (a) of the Lanham Act. Canadian Copyright Statute, the United Kingdom's Copyright Statute, Australia's Copyright Statute of 1968 and Japan's Copyright Law, all of which are enforceable by U.S. citizens under applicable treatise and conventions, under the Universal Copyright Convention (UCC) and under

the "Berne Convention" the judicial code 28 U.S.C.A. Section 1338 (a).

STATEMENT OF THE CASE

A. Introduction

Petitioner Chivalry Film Productions, et al., sues respondents NBC, et al. This action arises under the Federal Copyright Act of 1976, as amended, 17 U.S.C.A. Section 101. Seq. This action also arises under plaintiffs Claim II for an accounting that is a supplemental claim that this Court has jurisdiction over Count II is based on supplemental jurisdiction pursuant to 28 U.S.C. Section 1367. This action also arises under the Racketeer Influenced and Corrupt Organization (R.I.C.O) pursuant to Title 18 U.S.C (c) – (a) Federal Wire Fraud, (b) Federal Mail Fraud. This action also arises Pursuant to 28 U.S.C Section 1391 (b) and (c) and 1400 (a), under 15 U.S.C Section 1125 (a) and Section 43 (a) of the Lanham Act. This action also arises under the Canadian Copyright Statute, the United Kingdom's Copyright Statute, Australia's Copyright Statute of 1968 and Japan's Copyright Law, all of which are enforceable by U.S. citizens under applicable treaties and conventions, under the Universal Copyright Convention the ("UCC"), and under the Berne Convention for the Protection of Literary and Artistic Works "The Berne Convention". The Judicial Code (28 U.S.C.A. Section.1338 (a)). Because the United States, Canada, the United Kingdom, Australia and Japan are all signatories to the UCC and the Berne Convention and because this Court has personal jurisdiction over each of the defendants, plaintiffs Chivalry Film Productions and Joseph Ardito, are

entitled to seek and obtain both nationwide and extraterritorial injunctive relief and damages in this Court, as a result of the defendants' infringement of plaintiff's Chivalry Film Productions and Joseph Ardito's copyrights in each of the above-referenced countries, pursuant to the copyright laws of each of those countries, respectively.

This action consist of a comprehensive premeditated scheme by the defendants carefully designed and calculated over the years with intent through deliberate and willful acts of the defendants in concert, a scheme solely devised to intentionally deprive and defraud this petitioner of his Federal Certificates of Copyright Registration, rights accrued and protected to him from infringement of his own, origination, creation and/or development of his literary novel/screenplay entitled "The Tenant" and/or "The Dysfunctionals" (Certificates of Copyright Registrations – (a) Txu-742-462, (b) Txu-775-750, (c). Pau-2-380-629, (d). Pau-2-423-720, (e). Pau-2-283-460) these manuscripts are identified as comical satires ridiculing dysfunctional families. **See App. 196.**

On or about January, 2005 this plaintiff viewed "Meet the Fockers" the character, scenes and setting seemed very similar to that of this petitioner's copyrighted manuscript "The Tenant" and/or "The Dysfunctionals." After viewing "Meet the Fockers" and a subsequent viewing of "Meet the Parents" made it quite clear and evident to this plaintiff, that these screenplays were in fact a blatant copyright infringement of this petitioner's "Stolen Federal Copyrighted Materials" entitled "The Tenant" and/or "The Dysfunctionals" that had been reported stolen

on August 21st, 1998 police report number 980626165. **See also App. 197.**

The defendants released a screenplay motion picture entitled "Meet the Parents" and a derivative screenplay picture entitled "Meet the Fockers." The defendants intentionally, deliberately and willfully released these pictures to the general purchasing public two separate movies that consisted of overwhelming parts of the same identical synopsis, theories, characters, scenes and settings etc.

Each of these two movies motion picture productions entitled "Meet the Parents" and "Meet the Fockers" was prepared, created, developed and proscribed by said defendants and so released for viewing and purchase, by the general public in movie theatres, on video reproductions, and other electronic and/or magnetic tape devices and by methods of reproduction recording CD-ROM, cable television, reruns on national television and syndication television, Pay Per View, movies made for television and International/Foreign viewing by the general public throughout the world, by means of Foreign, International, Domestic, Interstate and Interstate commerce. (Satellite devices, computer software via email, United States Postal Service, United States Mail Service, mail and wire transfers and communications, publications and distributions) containing substantial material parts, components thereof, in fraud, deceit and deception of petitioner's federally protected and secured registrations of petitioner's Certificates of Copyright (Txu-742-462,Txu-775-750, Pau-2-380-629, Pau-2-423-720, Pau-2-283-460 comical satires ridiculing dysfunctional families entitled "The Tenant" and/or

"The Dysfunctionals" without the expressed , written or oral permission nor exclusive permission, consent or authority by petitioner in violation of petitioner's rights secured by and entitled under the Federal Copyright Act of 1976, as amended, 17 U.S.C.A. Section 101. Seq.

The defendants, and each of them, were all members of a group of the movie motion picture producers, directors, officers, authorized agents, benefactors, editors, screenwriters, movie composers, movie motion pictures, distributors and movie production companies were conspirators who agreed between and among themselves to engage act conduct and/or perform and did engage in criminal conduct and/or perform and are engaging in criminal activities in acting conducting and/or performing in acts of wrongful deception, misrepresentation, fraud, deceit to the petitioner and that of the purchasing public, wrongful deprivation of wrongful deception of petitioner's good name and reputation and credit as a screenwriter, composer, editor, and creator of certain copyrighted literary and/or artistic works and the owner of the copyrighted screenplays entitled "The Tenant" and/or "The Dysfunctionals."

On January 11th, 2006, the district court dismissed plaintiff's various other causes of action at the pleading stage. On December 22nd, 2006, the district court entered a final judgment that disposed of all the parties' claims.

The Second Circuit affirmed the district court's decision on October 4th, 2007.

B. STATEMENT OF FACTS

1. The Premeditated Scheme by the defendants to steal and deprive this petitioner of his federal protected copyrighted materials.

This petitioner in 1993 became a neighbor of **Robert Epstein,** an attorney affiliated with Julien & Schlesinger located at 150 William Street, 19 floor, New York, New York. This petitioner became involved in an International Custody battle in January 1997 that involved the petitioning of the "Hague Convention." Robert Epstein, familiar with the facts, helped assist this petitioner in formulating the legal affidavits for said case.

Robert Epstein knew this petitioner as a writer since 1993 that had every intention of breaking into the film industry on an independent level with a project entitled "The Tenant" and/or "The Dysfunctionals," a multi-faceted novel/screenplay, a comical satire ridiculing dysfunctional families.

Robert Epstein throughout the friendship had requested on numerous occasions to read this petitioner's novel and was never afforded the opportunity by petitioner. However, in an attempt of persuading this petitioner to release the novel/screenplay in January 1997, Robert Epstein claimed to have been one of this petitioner's best friends and vowed as an attorney to keep all materials in relation to said novel entitled "The Tenant" and/or "The Dysfunctionals" confidential as an attorney. Robert Epstein in gaining this petitioner's trust claimed he also intended to break

into the entertainment industry as an attorney and had no interest in the writings of novels or screenplays. Robert Epstein claimed that he would become "in house" counsel to this petitioner's future film company that became known as "Chivalry Film Productions" founded by this petitioner in 1998.

This petitioner felt as though Robert Epstein was sincere and felt comfortable in releasing the December 24th, 1996 novel entitled "The Tenant" and/or "The Dysfunctionals." It was agreed that all information regarding this novel/screenplay would remain confidential and that Robert Epstein would not make any copies or divulge any of the content.

Upon this agreement said novel/screenplay was released in good faith to Robert Epstein. Upon receipt of the novel/screenplay Robert Epstein flew off to the west coast and returned some four days later claiming that novel/screenplay was totally hilarious. Robert Epstein offered this petitioner a free office at Julien & Schlesingers located at 150 William Street, 19th floor, N.Y. N.Y, where this writer could work on his future projects.

On April 15th, 1998 this petitioner completed revisions and compilations on "The Tenant" and printed the novel out from his lap-top computer that was equipped with a small printer, with the intent of filing another copyright that same day. Robert Epstein came into the office and assisted this petitioner in making a copy of the project on Julien & Schlesingers's copy machine for the Library of Congress; it was 238 pages. Robert Epstein insisted that petitioner remain in the office and fill out the copyright application while he made the copy.

This petitioner after filling out the copyright application packaged the project in an envelope certified return receipt and upon information and belief Robert Epstein claiming to be on his way to the post office, mailed said copyright.

This same copyright mailed out on April 15th, 1998 had been returned from the Library of Congress a week and half later for **reasons unknown**. This petitioner checked the April 15th, 1998 copyright to make sure it was in **full** and re-mailed it back to the Library of Congress. **See App. 24.**

In August of 1998 this petitioner's best friend John died of liver cancer and after the funeral this petitioner headed out to California with his four year old daughter, Crystal, to vacation and to work on various projects outlines entitled "The Tenant" and "The Attorneys" and "The Hague." This petitioner made reservations at the Sheraton Hotel at Universal City.

Upon this petitioner's arrival into Los Angeles this petitioner received a phone call from **Robert Epstein** stating that this petitioner should go and stay at **Dr. Americo Semonini's** house for the night, another employee at Julien & Schlesigner's Office located at 150 William Street who was a doctor that evaluated personal injury cases for the firm.

Upon this petitioner's arrival at Dr. Americo Semonini house his girlfriend Brenda was present. Dr. Semonini requested to read this petitioner's project entitled "The Tenant" and/or "The Dysfunctionals." This petitioner flatly denied his

request and upon that note Dr. Americo Semonini claimed to be hungry. This petitioner was staying the night and as a courtesy was obliged to accompany and pay for the meal. My daughter Crystal at the time was only four years of age it was a bit late so I would have to carry her.

This petitioner was concerned about the projects and inquired as to the safety of the premise. Dr. Americo Semonini reassured this petitioner that the house was safe and the bags could be left. This petitioner made sure the bag containing the projects was secured with a lock prior to leaving the premise.

Upon the return to the house some 2 1/2 hours later, Dr. Semonini upon entering the premise screamed out that the door was open. It was a most awkward situation to encounter.

Upon entering the house, this petitioner checked his bag. The lock on the bag was missing, this petitioner opened the bag only to find that it had been ransacked, all of the papers had been disheveled and various project outlines were missing, "The Attorneys" and "The Hague. One project was put back "backwards" meaning that the first 60 pages were right side up and the next 178 pages were backwards. This project was entitled - "The Tenant" and/or "The Dysfunctionals" dated April 15th, 1998 (PAu-2-283-460). **See: App. 228**

This petitioner felt violated and became very cynical and notified Robert Epstein informing him of the theft and the petitioner's intentions of filing a police report. Robert Epstein instructed this petitioner not to file a report because Dr. Semonini

was his friend. This petitioner filed a report with the L.A.P.D. dated August 21st, 1998.
Los Angeles Police Report No.980626165.

Dr. Semonini some **2-5 days** after the physical theft of this petitioner's projects flew to Chicago on an alleged medical conference and to meet with two writer friends allegedly **Gregg Glienna and Mary Ruth Clarke**.

Upon information and belief Dr. Americo Semonini was actually arrested on his return flight from Chicago to Los Angeles for refusing to check his bag with the flight attendant that did not fit in overhead storage. This same scene was portrayed in "**Meet the Parents" 2000.**

Upon information and belief Dr. Semonini lived in Michigan where the supposed settings for the movie "Meet the Parents" 2000 had taken place even though scenes were filmed in N.Y.

Dr. Americo Semonini was **employed** at NBC Universal as a doctor on the sets.

Dr. Americo Semonini was an **agent employee and/or servant** of NBC Universal.

NBC Universal is a defendant in this action and also produced and distributed both "Meet the Parents" and "Meet the Fockers."

Steven Sodenburg is a close friend and patient of **Dr. Americo Semonini** was the producer affiliated with **Gregg Glienna and Mary Ruth**

Clarke and responsible for bringing the alleged 1991 "Meet the Parents" to NBC Universal.

Upon information and belief **Adam Schlesinger** an entertainment attorney located at 150 William Street, 19th floor, New York, New York is affiliated with most of the defendants in this action and attended school with **John Hamburg**.

John Hamburg who allegedly came up with most of the "Stolen Federal Copyrighted Materials" including characters, settings and scenes was one of the **screenwriters** on both **"Meet the Parents" and "Meet the Fockers."**

In essence the premeditated scheme to defraud and deprive this petitioner of his federal protected copyrights came from within his immediate surroundings. It is not like this petitioner is "coming out of Nebraska." These individuals were all linked to one another and the defendants in this case.

This petitioner upon viewing "Meet the Fockers" in January 2005 and subsequently viewing "Meet the Parents" intended to file a copyright action as expeditiously as possible. Robert Epstein had claimed he would assist, however he continually procrastinated for **months**. It was only when this petitioner began formulating the complaint on his own that Robert Epstein agreed to assist.

After **signing a retainer**, Robert Epstein made a conference call to Dr. Semonini informing him he had been retained to prosecute the case. This petitioner was instructed to remain silent during the conversation. The gist of said conversation seemed

tailored however during the course of said conversation Dr. Semonini told Robert Epstein that the script had been changed – "check your copy." The inference drawn by this statement would only conclude that both Dr. Semonini and Robert Epstein were both in possession of this petitioner's "Stolen Federal Copyrighted Materials." See **App. 229.**

In formulating this Petitioner's complaint Robert Epstein provided the prolific jurisdiction, attorneys' fees and made certain corrections that he claimed needed to be incorporated into the complaint. This petitioner originally intended to file said complaint in Westchester County because most of the defendants in the case had offices and maintain residence in Manhattan County, however, Robert Epstein was adamant and wanted to file said case in New York County upon a day of his availability.

Robert Epstein intentionally tried to sabotage the legal proceedings in this case due to his involvement. Discovery in this case would have unraveled the "Theft Ring" above involved in this petitioner's "Stolen Federal Copyrighted Materials" but this petitioner was denied discovery. **See App. 231.**

The respondents in this case throughout the proceedings have avoided any opposition to the allegations of interstate and international transportation of Stolen Federal Copyrights, fraud, mail fraud, wire fraud, perjured affidavits, tampering with federal evidence and a number of other crimes relating to this case.

The respondents' attorneys at the inception of the case made claims that certain defendants in this case

were not involved with the "Stolen Federal Copyrighted Materials," however, upon this petitioner request that the defendants provide an affidavit of non-involvement the defendants adamantly refused.

2. The Overwhelming Characters, Scenes and Settings that clearly prove that copying and plagiarism had occurred.

The **Characters** in "The Tenant" and/or "The Dysfunctionals": CIA, Mother, Father, Daughter, Sons, Dog, Nurse, Attorney, Doctors, Judge, Psychiatrist, Babies, toddlers, teenagers, Michael Angelo of Carpentry, In-Laws, A.S.P.C.A agent, Concerned Neighbor, Police Officer, Minister – Monk, Senior Citizens, Court Officer, Minister, etc, etc., **not only similar but identical** the characters in both "Meet the Parents" and "Meet the Fockers" were intentionally **portioned out**. Whatever portions of the "Stolen Federal Copyrighted Materials not used in "Meet the Parents" the balance of these same "Stolen Federal Copyrighted Materials were used in "Meet the Fockers."

Simple Mathematics: The same characters in "Meet the Parents" plus the same characters in "Meet the Fockers" equal all of the Characters combined in "The Tenant" and/or "The Dysfunctionals." This is indisputable and cannot be challenged.

The character differences in similarities are reviewed to determine whether the defendants' work has taken expression involving characters of the

first. *Zambito v. Paramount Pictures Corp.*, 613 F.Supp. 1107 (E.D.N.Y. 1985).

However, a number of similarities between characters can support a finding of substantial similarity, even if the similarities individually are common, stock elements. *Shaw v. Lindheim, 919 F.2d 1353 (9th Cir. 1990).*

In evaluating character similarity, courts tend to character background, attributes and motivation. *Herzog v. Castle Rock Entertainment*, 193 F.3d 1241, 1258 (11th Cir. 1999).

The Scenes in "The Tenant" and/or "The Dysfunctionals": Lie Detector test, frayed wire spark, control freak, time conscience, hidden surveillance camera, "I'm watching you," gay ridicule, volleyball game in where a woman sustains injury to her nose, skimpy bathing suit, carpenter ordering wood from Vienna, race home in where they pull up exactly three times making eye contact, incarceration scene, airport scene only person in the lobby of the airport, aircraft scene, frayed wire, shredded clothes, eviction, truth serum, drunk scene in where true feeling emerge, pulled over by police for speeding, rubber-dolls found by police with other sex paraphernalia leading the police to the conclusion that they were dealing with sexual deviants however upon further investigation this was not the case, stun gun-when administering the dose actually talking voltage, rules and regulations of the house my way or the shelter, jimmying the door, ransacking the bag, eavesdropping on the phone, speaking Asian dialect, southern accent, climbing up on the roof, tazer gun, police scene, Bureau Child

Welfare, investigative scene, jail scene, renovations of bathroom, hospital scene in where a baby is being born and the family is skeptical about doctor's qualifications however the delivery goes well and many more, rational v. dysfunctional method of bringing up children, psychiatrist getting to the foundation of the problem, claiming to have taken a shower however the hair is noticeably dry, etc, etc,.

Original Combination of substantial similarities and arrangement of individually unprotectable ideas can support a finding of copyright infringement. *Metcalf v. Bochco*, 294 F. 3d at 1073 (9th Cir. 2002).

The settings in "The Tenant" and/or "The Dysfunctionals": House, restaurant, car, vacation, airport, aircraft, hospital, volleyball court, beach, boat and many more.

The common settings for two works can support substantial similarity determination. *Universal Studios, Inc, v. Film Ventures International, Inc.*, 543 F. Supp 1134 (C.D. Cal. 1982).

"The Tenant" and/or "The Dysfunctinals" April 15th, 1998 copyright is a multifaceted novel/screenplay consisting of 238 pages that is equivalent to over 600 pages of script that incorporates all of the above characters, scenes and settings. "Meet the Parents" and "Meet the Fockers" are undoubtedly derived from this petitioner's "Stolen Federal Copyrighted Materials" the respondents **portioned off** the same **identical characters, identical scenes and identical settings** when you add both of the respondents' projects "Meet the Parents" and "Meet the Fockers"

all of the portioned characters, scenes and settings **equal** and are **identical** to the "Stolen Federal Copyrighted Materials" this is indisputable and clearly demonstrates on an elementary level that the respondents had unlawfully copied and plagiarized from this petitioner's "Stolen Federal Copyrighted Materials."

In *Harper & Row Publishers, Inc. v. Nation Enterprise,* 471 U.S. 539 (1985), they did not act in good faith, this weighs against giving him the benefit of fair use defense, the defendant had knowingly used a stolen copy of plaintiff's unpublished manuscript to obtain quotes. This fact contributed to the court's fair use defense.

Courts have held that an original combination of individuality unprotectable elements is itself protectable, and that the combination of unprotectable elements has been held eligible for copyright protection only if those elements are numerous enough and their selections and arrangements original enough that their combination constitutes an original work of authorship. *Dawson v. Hinshaw Music Inc.,* 905 F 2D 731, 736 15 U.S.P.Q. 2d 1132 (4th Cir. 1990), *see also Aliotta v. R. Dakin & Co.,* 831 F. 2d 898, 902, 4 U.S.P.Q. 2d 1869 (9th Cir. 1987). *Gershwin Publication Corp v. Columbia Artist Management, Inc.,* 443 F.2d 1159, (2d. Cir. 1971).

"The Tenant" and/or "The Dysfunctionals" is a **multifaceted** novel/screenplay a comical satire ridiculing dysfunctional families of which many movies can be made.

Jay Roach the director of both "Meet the Parents" and "Meet the Fockers" stated unequivocally in his "Meet the Fockers" commentaries "that the script was excellent and funny and had layer upon layers in which many movies could be made."

Jay Roach also stated in his commentaries that a "sequel was already written."

3. The Scheme of the alleged 1991 "Meet The Parents" videocassette that paved the way to Summary Judgment Motion.

The alleged 1991 "Meet the Parents" videocassette was requisitioned by this petitioner in July 2006 due to distortions and voice over. **See App. 27.** However, this request was circumvented by Tracie Coleman and the alleged 1991 "Meet the Parents" videocassette was not made available until after February or March of 2007, when summary judgment had already been decided. However, this petitioner had requested discovery on this case on numerous occasions but was declined by the court. **See: App. 22.**

(a) The perjured affidavits by employees located at the Library of Congress and offered into evidence.

Tracie Coleman and Richard D. Sharp both employees at the Library of Congress claimed under oath that the alleged 1991 videocassette by Gregg Glienna and Mary Ruth Clarke was found in a black box at the Library of Congress with "**no-labels attached on the cover**" side or front and "**no**

labels attached to the videocassette" on the front." See App. 25.

Richard D. Sharp a clerk at the Library of Congress sent a correction letter concerning PAU-1-571-116 (Meet the Parents) 1991 - stating that said video cassette tape came in an unmarked black box with no attached photo copies of the front of the video-cassette tape or of the front side of the video-cassette tape cover." **See App. 26.**

(b) The deliberate and intentional altering of the alleged 1991 "Meet the Parents" videocassette offered into evidence by intentionally and deceptively covering the label with the caption of the case for the purpose and intent of confirming fraudulent findings and receiving a favorable outcome. See App. 29.

Upon an independent inspection at the Library of Congress concerning the alleged 1991 "Meet the Parents" videocassette PAU-1-571-116. It was found that the affidavits procured by Tracie Coleman and Richard D. Sharp with respect to the 1991 videocassette had been procured with the intention of misleading this petitioner. The alleged 1991 Meet the Parents was in fact labeled on the side in a type written format either 60 minutes or 6 minutes because Gregg Glienna was also a song writer. However, the type written format had been manually altered and crossed out to reflect 72 minutes of time either altering 12 minutes of videocassette that is equivalent to 12 pages of script or altering an additional 66 minutes of videocassette that is equivalent to 66 pages of script, either way, the

evidence in this case has been compromised by these employees and the defendants. **See App. 30.** Tracie Coleman and Richard D. Sharp under oath had with intent and premeditation deceptively altered the affidavits with the intention of misleading this petitioner. **See: App. 24, 25, 26, 27, 29 and 30.**

Tracie Coleman in an affidavit also revealed that this petitioner was missing 31 pages from petitioner's April 15th, 1998 novel/screenplay entitled "The Tenant" and/or "The Dysfunctionals." Tracie Coleman has been entrusted with the videocassette and evidence in this case and has been deceptive, an investigation into these missing pages is warranted. **See App. 24.**

The defendants in this case in attempt to confirm, aid and abet the deception of the fraud perpetrated by Tracie Coleman and Richard D. Sharp concerning the alleged 1991 "Meet the Parents" videocassette, actually tampered with the federal evidence by deceptively covering the label on the side of the videocassette with the caption of the case and brazenly attaching this tampered federal evidence to defendants' summary judgment confirming on a visual note that **"no labels existed"** to intentionally distort and manipulate the outcome of these proceedings.

(c) The context of the alleged 1991 "Meet the Parents" videocassette.

The alleged 1991 "Meet the Parents" videocassette in question is a horror movie narrated by a gas station attendant in where all of the family members are killed including the dog. A stick is

thrown into the lake for the dog to fetch and the dog drowns. One daughter, a singer commits suicide and is found swinging from a rope in her bedroom claiming that she had been sexually molested by her sister's boyfriend. The father comes down the stairwell on a shotgun spree accidentally killing his surviving daughter and wife and supposedly dies of a heart attack thereafter.

The sequel to this alleged videocassette 1991 "Meet the Parents" is once again narrated by a gas station attendant - "A Father taking his children to the Circus" in where the entire family would be killed in a catastrophic event similar to the above.

The sequel to this petitioner's "The Tenant" and/or "The Dysfunctionals" is that the tenant moves on to "Meet another Dysfunctional family" squarely fitting into "Meet the Fockers." **Important to Note:** The respondents in this case unlawfully used the unused portions of characters, scenes and settings from the "Stolen Federal Copyrighted Materials" originally created and owned by this petitioner. This clearly proves beyond any reasonable doubt on a mathematical level that copying and plagiarism of the "Stolen Federal Copyrighted Materials" by the defendants is indisputable and cannot in reality be challenged.

ARGUMENT

The respondents' independent creation of the 1991 "Meet the Parents" videocassette has to be forensically evaluated due to the frauds perpetrated throughout these legal proceedings in relation to the

evidence. The affidavits procured under oath by employees (Tracie Coleman and Richard D. Sharp) were intentionally done so with the intent of misleading this petitioner and evading any type of discovery.

The intentional covering of the minutes of the alleged 1991 "Meet the Parents" videocassette with the caption of the case by defendants was to confirm the deceptive affidavits procured by Tracie Coleman and Richard D. Sharp as being true in relation to the labels. This proves that the defendants in this case will resort to any criminal means in protecting this "Organized Crime Syndicate" and protecting this alleged 1991 "Meet the Parents" videocassette from being forensically evaluated. The credibility of this evidence considering the circumstances surrounding this case is zilch.

Upon information and belief, Dr. Americo Semonini is affiliated with Robert Epstein, Steven Sodenberg, Mary Ruth Clarke, Gregg Glienna, Adam Schlesinger and John Hamburg.

Upon information and belief, Richard D. Sharp is employed at the Library of Congress and has a Ph.D. in English Literature and is also affiliated with the above, however, without discovery this petitioner has a problem verifying his connection.

The defendants in their summary judgment motion's reply papers to this petitioner's opposition claimed that this petitioner had mischaracterizations in the lie detector test - The lie detector test in "The Tenant" used a frayed wire that sparked in where the tenant was tied into a chair and questioned in

exposing the truth similar to Jack Brynes strapping Focker into a chair and questioning him to expose the truth.

The frayed wire spark scene was used as a home made lie detector test however when Gregg climbed up on the roof to pursue Jinx who vanished into thin air. Similar to Jimmy climbing up on the roof top chasing a neighbor who took off like a scared cat and vanished into thin air. Gregg started the fire with a frayed wire spark as he was trying to catch Jinx the cat who vanished into thin air.

The Tenant was traumatized by the ordeal and vented out his frustrations to the landlord. **similar** to Focker being traumatized by the ordeal and venting out his frustrations to Pam.

The landlord claimed to have known Bill Clinton, claiming to have been to the White House (Oval Office), claiming to have known the General and even claimed to have been going on a secret mission; **similar** to Jack Brynes having a picture with President Clinton, Jack Brynes having a picture with the General, Jack Brynes in a disguise dressed up as an Arab on a secret mission.

Defendants claim another mischaracterization: The landlord claimed to be CIA **similar** to Jack Brynes who was retired CIA agent.

Defendants claimed another mischaracterization in their reply papers, claiming that when the landlord claimed to be speaking Asian to the Asians he really did not know how to speak Asian **similar** Jack Brynes wife Dina – "Jack don't talk Thai..."

The tenant had a hidden surveillance camera in the house to view any undesirables **similar** to Jack's Nanny Camera.

The tenant views the camera in an attempt to prove the landlord and his brother were the true culprits **similar** to when Jack Brynes views the camera to prove that Gregg was the culprit.

The defenses of the respondents fall short of reality when respondents begin using similar scenes in trying to prove dissimilarities. A paradox in itself that is self-defeating. In essence actually helping this petitioner prove similarities and copyright infringement.

The respondents in this case have the luxury of choosing between 5 different copyrights of this petitioner totally evading the main "Stolen Federal Copyright. "

The district court set an example of the car scene however if you take the full context of the car scene many scenes will be revealed and whatever is deconstructed will be reconstructed in further proving combinations of substantial similarities and an arrangement of individually unprotectable ideas that can support a finding of copyright infringement. ***Metcalf v. Bochco,*** **n. 50** ***supra.*** **294 F .3d at 1073.**

Prior to the car scene the landlord is manning a window pacing back and forth cynical and apprehensively about his relationship with the new tenant working out **similar** to Jack Brynes who is

also manning a window cynical and apprehensive about Pam's relationship with her new boyfriend.

The landlord is time conscious **similar** to Jack Brynes being time conscious.

In "The Tenant" the tenant pulls into the driveway and sees the dilated pupil of the landlord "watching his every move" the tenant feels uncomfortable ... the landlord finally answers the door and claims to have been taking a shower however his hair was noticeably dry **similar** Focker who started the frayed wire spark fire claimed to Jack Brynes that he was taking a shower however his hair was noticeable dry. (The comical aspect is that they are both lying.)

The difference in whether you are asking whether the car is automatic or standard or what color is irrelevant, you are still asking about the car. The comical aspect is what leads up to the question.

All of the comical aspects that gave "Meet the Parents" and "Meet the Fockers" worldwide success were stolen and extracted from this petitioner's "Federal Protected Copyrights." It is far from coincidental to have all of the characters, scenes and settings including and not limited to deleted scenes.

4. The Statute of limitations concerning "Meet the Parents" January 11, 2006 order was ambiguous, not clarified and this petitioner was unaware.

The district court stated in its January 11, 2006 decision: "There can be little doubt that Ardito

should have known of any infringement by "Meet the Parents" at or shortly thereafter the highly publicized release of the film. In 2000 5% of the population in the United States saw "Meet the Parents" if this petitioner saw "Meet the Parents" the Statute of Limitations would not have been an issue. This petitioner was inundated in the Supreme Court in Manhattan concerning the custody of his daughter and this petitioner's mother was sick dying of lung cancer. At that time this petitioner was not only a full time dad taking care of his daughter but taking care of his mother as well. So it wouldn't appear clear that this appellant should have known. When this petitioner viewed "Meet the Fockers" the police were immediately notified.

5. Civil RICO

This case deals with an "Organized Crime Syndicate" whom have executed their premeditated scheme with precision in an unconscionable manner with the sole intent of stealing and depriving this plaintiff of his Federal protected Copyrights and unlawfully passing them off as their own in the making of defendants' motion pictures entitled "Meet the Parents" and "Meet the Fockers" for the purpose of this litigation. However, no discovery in this case has been afforded to this petitioner even though the defendants in this case have brazenly tampered with federal evidence, perjured affidavits and have intentionally perpetrated frauds throughout these legal proceedings. This truly violates and undermines one's perception of justice. This sort of criminal conduct has to be abolished in the interest of fairness and justice.

This petitioner is respectfully requesting that the Civil RICO dismissal be reversed due to the extenuating circumstances that have evolved in this case pertaining to the circumventing of evidence, the deceptive tampering of evidence by the defendants. The Civil RICO will give this petitioner the opportunity to reveal the copyright theft ring.

Summary judgment may not be granted unless "the pleadings, depositions, answers to interrogatories and admissions on file, together with affidavits, if any, show there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law." Fed. R. Civ. P. 56 (c). *See also Celotes Corp. v. Catrett,* 477. 477 U.S. 317, 322 (1986). *Anderson v. Lobby, Inc.,* 477 U.S.242, 247-48 (1986). *Gallo v. Prudential Residential Servs, Ltd. P'ship,* 22 F. 3d 1219, 1223 (2d Cir.1994).

In determining whether summary judgment is appropriate, a court must resolve all ambiguities and draw all reasonable inferences against the moving party. See *Malsushita Elec Indus. Co. Ltd. v. Zenith Radio Corp.,* 475 U.S. 574, 587 (1986).

Summary judgment is improper if there is any evidence in the record from any source from which a reasonable inference could be drawn in favor of the non-moving party. See *Chambers v. TRM Copy Ctrs., Corp.,* 43 F.3d 29, 37 (2d Cir. 1994).

In considering the motion, the court's responsibility is not to resolve disputed issues of fact, but to assess whether there are factual issues to be

tried. *Knight v. U.S. Fire Inc. Co.,* 804 F. 2d 9, 11 (9th Cir. 1986).

Summary judgment should have failed because there are questions of fact in determining this case involving the premeditated theft of Federal Protected Copyrights, the tampering of federal evidence, the perjured affidavits, the alleged 1991 Meet the Parents video cassette, access and the overwhelming characters, scenes and settings that clearly prove that the respondents in this case beyond any reasonable doubt copied and plagiarized the Stolen Federal Copyrighted Materials in the making of "Meet the Parents" and "Meet the Fockers." **See Opposition to Summary Judgment Motion, App. 31 and Table of Similarities, App. 75 -179.**

CONCLUSION

For the foregoing reasons stated herein, this petitioner respectfully request and prays that the judgment of the Second Circuit be reversed, and this case be remanded to the district court for discovery and trial in the interest of justice and grant this petitioner such other and further relief as the court deems just and proper.

State of New York)
) **ss.**
County of New York)

I am the petitioner in this action herein, I have read the foregoing Petition for a Writ of Certiorari and know the content thereof and the same is true of my own knowledge, except as to the matters stated to be alleged upon information and belief and those matters I believe to be true.

Joseph Ardito

Sworn to before me this
3rd day of March, 2008

Notary Public

KATERINA I. GRAJALES
Notary Public, State Of New York
No. 01GR5010801
Qualified in N.Y. County
Commission Expires 4/5/20 11

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Supreme Court, U.S.
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NO. 07-1142

In The
UNITED STATES SUPREME COURT

CHIVALRY FILM PRODUCTIONS and JOSEPH ARDITO Individually,

Petitioner,

-v-

NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED, UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC, UNIVERSAL CITY STUDIOS LLLP, UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. D/B/A DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM, NANCY TENENBAUM FILMS, INC., TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, AND JAY ROACH D/B/A EVERYMAN PICTURES,

Respondents,

On Petition For WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS For the SECOND CIRCUIT

APPENDIX

Pro Se: Joseph Ardito
Petitioner
97-12 76th Street
Ozone Park, NY 11416
Tel. No. (917) 435-2820

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

SUMMARY ORDER
07-0665-cv

MANDATE
(Filed Oct. 04, 2007)
Catherine O'Hagan Wolfe, Clerk

At a stated term of the Untied States Court of Appeals for the Second Circuit, held at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, in the City of New York, on the 4th day of October, two thousand seven.

PRESENT:

HON. PIERRE N. LEVAL,
HON. ROBERT D. SACK,
Circuit Judges,
HON. NICHOLAS G. GARAUFIS,*
District Judge.

- -

Chivalry Film Productions, Joseph Ardito,

Plaintiffs-Appellants,

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* The Honorable Nicholas G. Garaufis of the United States District Court fot he Eastern District of New York, sitting by designation.

- v –

NBC Universal, Inc., et al.

Defendants-Appellees.

- -

Appearing for Appellants: Joseph Ardito, pro se, Ozone Park, N.Y.

Appearing for Appellees: Mark a. Tamoshunas, Stephen F. Huff, Tom J. Ferber, Pryor Cashman LLP, New York, NY

Appeal from a judgment of the United States District Court for the Southern District of New York (Gerard E. Lynch, Judge).

UPON DUE CONSIDERATION, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the judgment of the district court be, and it hereby is AFFIRMED.

Plaintiff-appellant Joseph Ardito, representing himself pro se and purporting to represent Chivalry Film Productions, an individual proprietorship, appeals from a December 22, 2006, judgment of the United States District Court for the Southern District of New York (Gerard E. Lynch, Judge) granting summary judgment to the defendants-appellees as to all of the appellants' claims pursuant to Federal Rule of Civil Procedure 56. We assume the parties' and counsel's familiarity with the facts

and procedural history of this case and the scope of the issues presented by this appeal.

We affirm the judgment of the district court for substantially the reasons set forth in its opinion and order, Chivalry Film Productions v. NBC Universal, Inc., No. 05 CV 5627, 2006 U.S. Dist. LEXIX 92956, 2006 WL 3780900 (S.D.N.Y. Dec. 22, 2006).

The judgment for the District Court is hereby AFFIRMED.

FOR THE COURT:
Catherine O'Hagan Wolfe, Clerk
of the Court

/s/ Lucille Carr

A TRUE COPY
Catherine O'Hagan Wolfe, Clerk
By: /s/ Lyneth Rodriguez
Deputy Clerk

05Civ.5627(GEL)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X

CHIVALRY FILM PRODUCTIONS
and JOSEPH ARDITO,

Plaintiffs,

v.

NBC UNIVERSAL, INC., et al.,

Defendants.

----------X
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OPINION AND ORDER

Joseph Ardito, *pro se*

Stephen F. Huff, Tom J. Ferber,
Mark a Tamoshunas, Richard J. Purcell,
Prior Cashman Sherman & Flynn LLP
New York, NY, for defendants.

GERARD E. LYNCH, District Judge:

In this copyright infringement action, pro se plaintiff Joseph Ardito charges that defendants, a number of motion picture production and distribution companies, infringed his copyrights† Defendants move for summary judgment dismissing plaintiff's claim, arguing that the allegedly infringing films are independently created works that no reasonable juror could find substantially similar to plaintiff's copyrighted material. Defendants' motion will be granted.

Plaintiff charges that two movies produced and distributed by certain of the defendants, *Meet the Parents* and its sequel *Meet the Fockers*, infringe his copyrights in several versions of a novel and screenplay entitled variously *The Tenant* or *The Dysfunctionals* (hereafter collectively "*The Tenant*").

To establish copyright infringement, plaintiff must demonstrate "(1) ownership of a valid copyright, and (2) copying of constitutent elements of the work that are original." Feist Publ'ns, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340, 361 (1991); see Matthew Bender & Co. v. West Publ'g Co., 158 F.3d 693, 699 (2d Cir. 1998). Copying may be established either through direct evidence of copying or through indirect evidence, including "'similarities that are probative of copying between the works.'" Hogan v. DC Comics, 48 F.Supp.2d 298, 308 (S.D.N.Y. 199), quoting Castle Rock Entm't, Inc. v. Carol Publ'g

† On January 11, 2006, this Court dismissed plaintiff's various other causes of action at the pleading stage. *Chivalry Film Prods. v. NBC Universal, Inc.*, No. 05 Civ. 5627, 2006 WL 89944 (S.D.N.Y. Jan. 11, 2006). In this Opinion, as in that one, the Court refers to plaintiff in the singular, since the co-plaintiff named in the pleading is a sole proprietorship having no legal existence independent of Ardito himself. See id. at *1 n.1.

Group, Inc., 150 F.3d 132, 137 (2d Cir. 1998). Defendants do not dispute that plaintiff holds valid copyrights in the various versions of The Tenant. They argue, however, that no reasonable finder of fact could find copying, because the works are not substantially similar, and because plaintiff has failed to raise a genuine issue of fact with respect to defendants' claim of independent creation. Defendants are right on both grounds.‡

Summary judgment may be granted on a copyright infringement claim when "no reasonable trier of fact could find the works substantially similar." Williams v. Crichton, 84 F.3d 581, 587 (2d Cir. 1996) (citation and internal quotation marks omitted). That is precisely the case here.

The works at issue could not be more different in "total concept and feel." Green v. Lindsay, 885 F.Supp. 469, 481-82 (S.D.N.Y. 1992). Defendants' movies are farcical situation comedies in which a young man encounters various embarrassing calamities while trying to win over the parents of his fiancée, and in which the parents of the engaged couple, who represent opposing cultural and political stereotypes, seek to become comfortable with each

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‡ Defendants also claim there is no evidence that any defendant had access to *The Tenant*. Indeed, plaintiff offers no evidence whatsoever that any defendant ever saw any of his works, asserting only that while visiting Los Angeles in 1998, and staying with a friend of his attorney, his bags were broken into and ransacked by unknown individuals, and "[v]arious project outlines were missing." (P.Rule 56.1 Stmt. ¶8.) Even assuming that a thief took or read a version of *The Tenant* (something not expressly asserted in plaintiff's statement), there is absolutely no evidence that any defendant ever came into possession of that material. Nevertheless, because plaintiff may not have had an adequate opportunity to take discovery of defendants on this issue, the Court declines to rely on the absence of evidence of access as a ground for summary judgment.

other. In the tradition of slapstick comedies, exaggerated disasters ensue from the encounters among the protagonists, but the tone is light, no one suffers lasting damage, and the situations resolve happily with the former antagonists achieving grudging mutual respect and accommodation. The works are designed as light entertainment for a mainstream audience.

Plaintiff's work is more in the violent horror genre. Any humor in the work is, in plaintiff's own words, "sick humor." (Ferber Decl. Ex. F.) The prologue to the novel version warns that "[i]f you find the material contrary to your taste, vile, abusive and pornographic, the author has achieved his objective" (id. Exs. F, G), and the work more or less lives up to that claim. The work follows a common theme in the horror genre, that of the unwitting "normal" protagonist thrown together with a group of violent sociopaths, who torment and torture him. The plot involves three brothers, their sister and their father, whose back story involves extraordinary intrafamily violence and abuse, depicted at considerable length. (See, e.g., id. Ex. J at 20-23.) The eponymous tenant rents a room in the house from one of the brothers, who repeatedly beat and abused him, in addition to engaging in extreme violence against various other characters. (See, e.g., id. at 55-56, 77-78, 101-105, 135-140.) Eventually, the three brothers are brought to justice and committed to a psychiatric hospital, and the police suspect the tenant of murdering the father, who in fact commits suicide. (See id. at 137-40.) The treatment is unrelentingly horrific and is presumably aimed at the popular niche market for graphic tales of violence.

Plaintiff attempts to show similarity by providing a long chart of alleged similarities between specific scenes in his work and defendants'. These parallels, however, involve the most trivial and generic incidents. For example, in *Meet the Parents* the fiancée's father ridicules his prospective son-in-law's car, and in *The Tenant* the abusive landlord is critical of his tenant's vehicle. (See Artido Decl. at 6.) Even if the scenes were otherwise similar, there is nothing original in either scene; the events are simply minor, generic set pieces establishing the relationships between the parties through common experiences relating to cars. In any event, the scenes are not even that similar. Apart from the differences in tone, the father in defendants' film sneers at the make and color of the car, thus making his daughter's suitor feel embarrassingly outclassed in wealth and taste, while in plaintiff's work the villain objects to the protagonist's choice of a standard shift, because he might "need to borrow [the tenant's] car," thus establishing his assumed power over his tenant's property. (Id.) The scenes are thus strikingly different. Plaintiff offers scores of such specious similarities, all of which can be similarly deconstructed.

The characters, pace, settings, themes and plots of the two sets of materials are in fact so extraordinarily different that plaintiff is reduced to arguing that copying can be proved by the *absence* of similarity, alleging that defendants "blatantly went through extremes in revisions and manipulation in an attempt to conceal and subterfuge said crime by revising said screenplay." (Compl. ¶ 1960.) But this claim is self-defeating. As the Second Circuit has held, "[e]ven if an alleged copy is based on a

copyrighted work, 'a defendant may legitimately avoid infringement by intentionally making sufficient changes in a work which would otherwise be regarded as substantially similar to that of the plaintiff's." Eden Toys, Inc. v. Marshall Field & Co., 675 F.2d 498, 501 (2d Cir. 1982), quoting Warner Bros. v. Am. Broad. Cos., 654 F.2d 204, 210 (2d Cir. 1981) (additional citation omitted). In short, no reasonable fact-finder could conceivably find the works so substantially similar as to warrant an inference that one was copied from the other.

Summary judgment is also appropriate because defendants can establish an independent source for their films pre-dating *The Tenant*. Defendants' works do not pretend to be wholly original. They are based on an earlier film, also called *Meet the Parents*, that was made and copyrighted in 1991, and to which defendants acquired the rights in 1994. (See Ferber Decl. Ex. E; Tamoshunas Decl. Ex. C.) Plaintiff's earliest copyright for The Tenant dates to 1996. (See Ardito Decl. ¶ 10; id. Ex. A.) Unlike *The Tenant*, the earlier version of *Meet the Parents* shares a similar theme and tone with defendants' film; the similarity extends to the very names of the principal characters in the two versions. While plaintiff attempts to discredit defendants' claim by pointing to various differences between the two versions of *Meet the Parents*, those differences are far less striking than the differences between either version and plaintiff's work, and the similarities between the two versions of *Meet the Parents* are far more striking. No reasonable fact-finder could conclude that the challenged works derived from *The Tenant*, rather than from the earlier *Meet the Parents* film and

screenplay. Summary judgment is appropriate where a plaintiff fails to offer evidence sufficient to raise a factual question about a defendant's proof of independent creation, including "re-creation" from an independent pre-exisiting source. See Novak v. Nat'l Broad. Co., 760 F. Supp. 47, 48 (S.D.N.Y. 1991).

Accordingly, defendants' motion for summary judgment is granted.

SO ORDERED.

Dated: New York, New York
December 22, 2006

/s/ Gerard E. Lynch
GERARD E. LYNCH
United States District Judge

05Civ.5627(GEL)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X

CHIVALRY FILM PRODUCTIONS
and JOSEPH ARDITO,
Plaintiffs,

v.

NBC UNIVERSAL, INC., et al.,

Defendants.

----------X
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OPINION AND ORDER

Joseph Ardito, *pro se*

Stephen F. Huff, Tom J. Ferber,
Mark a Tamoshunas, Richard J. Purcell,
Prior Cashman Sherman & Flynn LLP
New York, NY, for defendants.

GERARD E. LYNCH, District Judge:

Joseph Ardito[§] brought this case pro se, charging a variety of defendant entities and individuals in the movie business with copyright infringement, violations of the federal racketeering statutes, and a number of other tortuous acts. Defendants move for dismissal on a number of grounds. The motion will be granted in part and denied in part.

The gravamen of plaintiff's action lies in copyright infringement. Although the complaint is extremely lengthy, its factual allegations, which for purposes of the present motion must be accepted as true, are fairly straightforward. Ardito asserts that he is the author of a copyrighted screenplay or screenplays, entitled "The Tenant" and/or "The Dysfunctionals," described as "comic satires ridiculing dysfunctional families." (Compl. ¶ 1940.) The complaint charges that defendants infringed Ardito's copyrights by copying "the same identical synopsis, theories, character analysis, ideas, etc." of his screen play(s) in producing their popular films, "Meet the Parents" and its sequel "Meet the Fockers." (Id. at ¶ 1942.) Unlike many copyright plaintiffs, Ardito does not allege that he ever submitted his screen play to any of the defendants for consideration. Rather, he appears to allege that

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[§] The complaint is brought in the names of Ardito and of Chivalry Film Productions, which is identified as a "sole proprietorship duly organized...under...the laws of the State of New York" and wholly owned by Ardito. (Compl. ¶¶ 4, 7.) Such a proprietorship, under New York law, has no legal entity apart from that of its proprietor. See, e.g., Mattel, Inc. v. Adventure Apparel, 00 Civ. 4085 (RWS), 2001 WL 1035140, at *5 (S.D.N.Y. Sept. 7, 2001) ("[The] sole proprietorship [is] owned by [defendant] and, therefore, [it] is not a separate legal entity capable of being sued.") Thus, Ardito is effectively the sole plaintiff, and will be so referred to in this Opinion.

his work was not merely metaphorically stolen from him in a 1998 burglary. (Id. at ¶; see also P. Mem. 3.)

Certain allegations in the complaint appear to cast doubt on the viability of plaintiff's claim. Ardito's description of what was copied suggests that the resemblance between the works is at the level of uncopyrightable general concepts. Indeed, the complaint suggests that the actual expression in the allegedly infringing works may be quite different from that of the copyrighted works, in that defendants are said to have gone "through extremes in revisions and manipulation" in order to conceal the origin of their ideas "by revising [his] screenplay." (Compl. ¶1960.) Nevertheless, construing the complaint liberally as befits a pro se filing, see Burgos v. Hopkins, 14 F.3d 787, 790 (2d Cir. 1994), plaintiff clearly states a claim for copyright infringement. Defendants do not contend otherwise.

Defendants do argue, however, that Count One should be dismissed as barred by the statute of limitations, to the extent that it asserts claims for acts pre-dating June 16, 2002.

Defendants are correct about several propositions. First, the statute of limitations for copyright violations is three years. 17 U.S.C. § 507(b); Kregos v. Associated Press, 3 F.3d 656, 661 (2d Cir. 1993). Second, as the complaint in this case was filed on June 16, 2005, any claim that accrued before June 16, 2002, is time-barred. Third, although there is some disagreement among the courts as to when a claim for copyright infringement accrues, Judge Kaplan's thorough analysis in

Auscape Int'l v. Nat'l Geographic Soc'y, No. 02 Civ. 6441 (LAK), 2004 WL 1798130, at *4-*8 (S.D.N.Y Aug. 12, 2004), is persuasive that the cause of action accrues on the date of the infringement, not on the date that the infringement is discovered. At any rate, even courts following the contrary "discovery rule" hold that the date of accrual is the date "plaintiff knew *or should have known* of the infringement." Sapon v. DC Comics, No. 00 Civ. 8892 (WHP), 2002 WL 485730, at *5(S.D.N.Y. mar. 29, 2002) (emphasis added).** Fourth, plaintiff claims infringement by two films, "Meet the Parents" and "Meet the Fockers." The former film was released on or about October 6, 2000. Any infringement by the creation of that film occurred no later than that date, and there can be little doubt that Ardito should have known of any infringement by "Meet the Parents" at or shortly after the highly-publicized release of that film.

Thus, it appears clear that plaintiff will be unable to recover for infringements committed by "Meet the Parents." Count One, however, also

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** Defendants' brief blandly cites Auscape for the proposition that a claim for copyright infringement accrues on the date of the infringement, and derides plaintiff's argument in favor of accrual on discovery as "plainly incorrect in light of the holding in Auscape." (D. Reply 2.) But Auscape is not binding authority, and its holding represents one side, and the minority side at that, of an issue hotly disputed by various courts. This Court expects a higher standard of candor from members of its bar. Counsel cannot fairly be accused of deception; Judge Kaplan's careful discussion in Auscape fairly lays out the conflicting authority and the arguments on both sides, and it should certainly be expected that the Court would review the cited authority. But particularly when dealing with a lay adversary, who might not be alerted by the citation to read the case and discover the contrary authority, lawyers should display greater accuracy and candor in stating the law by expressly acknowledging the existence of contrary authority.

charges defendants with an infringement in connection with "Meet the Fockers," which was released in 2004. Thus, Count One may not be dismissed, and in the absence of a factual record, it is premature for the Court to attempt to carve up the claim by making definitive rulings about the precise contours of potential liability on that count.

Plaintiff's remaining claims, however, have less validity. Cont Two asserts a claim for unjust enrichment. This appears merely to restate the claim that defendants made money by legal or equitable rights that are equivalent to any of the exclusive rights within the general medium of expression and come within the subject matter of copyright as specified by sections 102 and 103." 17 U.S.C. § 301 (a). The Second Circuit has derived from this statute a two-part test for Copyright Act preemption of state law claims. "The Copyright Act exclusively governs a claim when: (1) the particular work to which the claim is being applied falls within the type of works protected by the Copyright Act under 17.U.S.C. §§ 102 and 103 ['the subject matter requirement'],' and (2) "the claim seeks to vindicate legal or equitable rights that are equivalent to one of the bundle of exclusive rights already protected by copyright law under 17 U.S.C. § 106 ['the general scope requirement']." Briarpatch Ltd., L.P. vl Phoenix Piectures, Inc., 373 F3d 296, 305 (2d Cir. 2004), citing 17 U.S.C. §301(a) and Nat'l Basketball Ass'n v. Motorola, Inc., 105 F.3d 841, 848 (2d Cir. 1997). "In other words, state law claims that are substantively redundant of Copyright Act claims are preempted." Sharp v. Patterson, No. 03 Civ. 8772 (GEL),2004 WL 2480426, at *7 (S.D.N.Y. Nov. 3, 2004). Since Count Two seeks recovery under state

law for the same acts that constitute the alleged infringement of copyright, it is pre-empted by the Copyright Act. See, e.g., Briarpatch, 373 F.3d at 306 (stating that in determining whether a state law claim is preempted, the court examines what the plaintiff "seeks to protect, the theories in which the matter is protected, and the rights sought to be enforced," and "taking a restrictive view" of extra elements that might make a state law claim different from a federal one); Weber v. Geffen Records, Inc., 63 F.Supp. 2d 458, 462 (S.D.N.Y. 1999)("Whether a state law claim is preempted depends on whether it is derivative of a copyright claim or is based on an "extra element" beyond those of a copyright claim."); Netzer v. Continuity Graphic Assocs., Inc., 963 F. Supp. 1308, 1322 (S.D.N.Y. 1977)("[Plaintiffs'] claim of unjust enrichment is preempted by the federal Copyright Act.") Therefore, Count Two is dismissed.

Count Three alleges violations of the RICO statute, 18 U.S.C. §§ 1961-1964. Courts are skeptical of plaintiffs' efforts to turn ordinary civil litigation into racketeering claims. Goldfine v. Sichenzia, 118 F. Supp. 2d 392, 397-98 (S.D.N.Y. 2000). At the same time, RICO complaints must be sustained if they state a claim, however farfetched, on which relief may be granted if the allegations of the complaint can be proved. Here, defendants argue that the complaint fails to state a claim because the predicate acts alleged to constitute a pattern of racketeering activity are mail and wire fraud claims, and thus subject to the particular pleading requirements of Rule 9(b), Fed. R. Civ. P. See Anatian v. Coutts Bank (Switzerland) Ltd., 193 F.3d 85, 88 (2d Cir. 1999) (affirming dismissal of claim of RICO predicate acts of mail and wire fraud for

failure to plead with sufficient particularity). Defendants are clearly right that plaintiff utterly fails to identify any details of the alleged fraud. Moreover, to the extent the alleged "fraud" can be discerned, it appears that Ardito alleges that defendants committed fraud by presenting their films as their copyrighted works, without acknowledging that the films infringed his copyright. (Comp. 1960.) This is merely an effort to turn a simple copyright claim into mail or wire fraud, and will not suffice.

However, defendants ignore the allegation in the complaint that allege that their "pattern of racketeering consisted of Defendants aiding and abetting the commission of countless acts of federal Interstate Transportation of stolen property obtained by a crime," citing 18 U.S.C. §2314. (Compl. ¶ 1961.) In light of plaintiff's claim that his manuscript was literally stolen from him (id. at ¶1940), plaintiff appears to have alleged a number of crimes other than fraud, specifically a number of acts of interstate transportation of stolen property.†† Nevertheless, the RICO count must be dismissed for a different reason, because the complaint fails to allege a RICO "pattern." A pattern requires a showing of "continuity," or the threat thereof. H.J. Inc. v. Northwestern Bell Tel. Co., 49 U.S. 229, 240 (1989). Here, plaintiff alleges nothing more than a single, limited scheme to exploit his copyrighted work by committing infringing his copyrights. The only viable alleged predicate acts, the interstate transportation of his stolen manuscript, must have

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†† Although plaintiff does not explicitly allege that the property had a value greater than $5000, as required by § 2314, his claims for damages indicates a belief that the works had a substantial value.

taken place, if at all, within a limited period between the theft in August 1998 and the release of the first completed film in 2000. A scheme of such limited purpose, accomplished in such a limited period, cannot constitute a RICO pattern, and thus, count Three is dismissed.

Count Four alleges common-law fraud, claiming that defendants committed a fraud on the Copyright Office, and perhaps on the general public, by presenting the challenged films as their original works without disclosing that they were copied from plaintiff. This claim fails, because plaintiff has no standing to object to any such fraud. To recover damages for fraud, a plaintiff must prove the *he* reasonably relied on misrepresentations made to *him*. Plaintiff does not allege that defendants misrepresented anything to him, and as the author of the allegedly infringed works, he could not conceivably have relied upon any claim that the infringing works were original. See Barnhart v. Fderated Dep't Stores, Inc., No. 04 Civ. 3668, 2005 WL 549712 (S.D.N.Y. Mar 8, 2005)(finding that plaintiff had not alleged any reliance and dismissing claim that defendants falsely filed a claim with the Copyright office),‡‡ Plaintiff's claim that he relied on internet information about defendants' films (P. Mem.5) does not change this conclusion. Defendants' motion to dismiss is granted as to Count Four.

Count Five charges unfair competition in violation of the Lanham Act. This count also fails to state a claim distinct from the copyright infringement charge. The Supreme Court has held

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‡‡ Plaintiff tries to distinguish this case as relating to a song rather than a screenplay. (See P.Mem.5.) The legal principles involved do not depend on the nature of the copyrighted material.

that the Lanham Act protects only "the producer of ...tangible goods that are offered for sale, and not...the author of any idea, concept, or communication embodied in those goods." Dastar Corp. v. Twentieth Century Fox Film Corp., 539 U.S. 23, 37 (2003). The right to copy creative works, with or without attribution, is the domain of copyright, not of trademark or unfair competition. Id. at 33. "The failure to credit the true author of a copyrighted work is not a false designation of origin, but a violation of copyright." Freeplay Music, Inc. v. Cox Radio, Inc., __ F.Supp.2d __,__, No. 04 Civ. 5238 (GEL), 2005 WL 1500898m at *3-*4(S.D.N.Y. June 23, 2005). Plaintiff has failed to state a claim of unfair competition under the Lanham Act.

Finally, although plaintiff has thus far undertaken to represent himself without the services of an attorney, in Count Six he demands attorney's fees. This demand does not state a separate cause of action, but merely requests a form of relief in connection with plaintiff's copyright claim. To the extent that plaintiff attempts to assert a separate cause of action, Count Six is dismissed; however, the request for attorneys' fees remains an aspect of the requested damages, should plaintiff incur any such fees, and should he prevail in the case.

In addition to the various arguments addressed to specific counts of the complaint, defendants also move to dismiss the entire complaint on grounds that its length and prolixity violates Rule 8, Fed. R. Civ. P., which requires that a complaint contain "a short and plain statement of the claim," and that "each averment of a pleading shall be simple, concise, and direct." Fed. R. Civ. P. 8(a)(2), 8(e)(1). On the surface, the argument has

considerable merit. The complaint, exclusive of exhibits, runs to 149 pages and 1983 paragraphs. However, the vast bulk of the complaint (pages 3 through 136, and ¶¶9-1939), consists of a series of repetitious and alternative allegations of every conceivable description of each defendant, its addresses and offices, and its potential relationships with every other defendant. Even to require each defendant to affirm or deny these mostly irrelevant descriptions would impose a substantial burden. In contrast, the core allegations of the copyright infringement are relatively compact and clear, especially by the standards of pro se pleading. Accordingly, rather than dismiss the complaint, and require the plaintiff to replead the legitimate interests of the defendants can be accomplished by striking the redundant and unnecessary portions of the complaint. Defendants will not need to answer allegations that are stricken; nor, of course, will they be required to answer claims that have been dismissed. To the extent that the addresses or corporate relationships of the defendants are relevant to the case, such information can be sought in discovery.

Finally, defendant Twentieth Century Fox Film Corporation originally moved to dismiss the complaint as to it for failure of service; it is now conceded that plaintiff has cured this failure, and that motion has accordingly been withdrawn. (D.Reply 1 n.2.)

CONCLUSION

Accordingly, for the reasons set forth above, defendants' motion to dismiss is granted with respect

to Count Two through Six, and those claims are dismissed with prejudice. The motion to dismiss is denied with respect to Count One. Paragraphs 9 through 1939 are stricken, except for such paragraphs as allege that any defendant was a producer and/or distributor of the movies "Meet the Parents" and "Meet the Fockers."

SO ORDERED.

Dated: New York, New York
January 11, 2006

/s/ Gerard E. Lynch
GERARD E. LYNCH
United States District Judge

Aug 03 06 1:40a Chivalry Film Productions

Dear Judge Lynch,

This fax is a request for a 2nd extension of time in opposition to defendant's summary judgment motion due on August 7th, 2006. This plaintiff needs an additional 2 weeks of time in formulating and completing his opposition.

In the process of reviewing the defendants "Irrefutable Documentary Evidence" and in the process of reviewing plaintiff's finding which are not even complete.

The plaintiff in this action will now state that the projects entitled "Meet the Parents and Meet the Fockers" are in fact a product of Plaintiff's Stolen Federal Copyrighted Materials" which let to other movies and spin offs.

The overwhelming comparisons are far too many to be coincidental. "Meet the Parents and Meet the Fockers are in fact a product of Plaintiff's "Stolen Federal Copyrighted Materials" which started a new trend in comedy.

For all of the above reasons this plaintiff respectfully request that the summary judgment motion be held in abeyance and a conference be scheduled concerning discovery or limited discovery and a timely extension be granted in opposition to defendants summary judgment motion.

Thank you,
Respectfully Submitted

/s/ Joseph Ardito
Chivalry Film Productions and
Joseph Ardito,
Plaintiffs
150 William Street 10th Floor
New York, New York 10038
Tel. No. (917) 425-2820

[MEMO ENDORSED]
The application for an extension is granted only to the extent that plaintiff's response will be due on August 11, 2006. There will be no further extensions. Plaintiff's response was originally due on July 17, and was extended in deference to his pro se status. The request for a conference and for a lifting of the stay on discovery is denied.

SO ORDERED
/S/ Gerard E. Lynch
GERARD E. LYNCH, U.S.D.J.

Library of Congress
Copyright Office
Of the United States
Washington, D.C.

THIS IS TO CERTIFY that the attached photocopy is a true representation of the work entitled **"THE TENANT"** deposited in the Copyright Office with claim of copyright registered under number PAU 2-283-460.

THIS IS TO CERTIFY FURTHER, that pages 191 through 222 were missing from the registered deposit for this registration.

IN WITNESS WHEREOF, the seal of this Office is affixed hereto on December 14, 2005.

Marybeth Peters
Register of Copyrights
/s/ Tracie M. Coleman
By: Tracie M. Coleman
Head
Certifications and
Documents Section
Information and Reference
Division

Use of this material is governed by the U.S. copyright law 17, U.S.C. 101 et seq.

Library of Congress
Copyright Office
Of the United States
Washington, D.C.

THIS IS TO CERTIFY that the attached visual recording in video-cassette for is a true representation of the video-cassette tape entitled **MEET THE PARENTS** deposited in the Copyright Office with claim of copyright registered under number **PAU 1-571-116**.

THIS IS TO CERTIFY FURTHER, that the attached photocopies are a true representation of the front of the video-cassette tape, front and side of the video-cassette tape cover.

IN WITNESS WHEREOF, the seal of this Office is affixed hereto on March 7, 2006.

Marybeth Peters
Register of Copyrights
/s/ Tracie M. Coleman
By: Tracie M. Coleman
Head
Certifications and
Documents Section
Information and Reference
Division

Use of this material is governed by the U.S. copyright law 17, U.S.C. 101 et seq.

United States Copyright Office
The Library of Congress
[seal]

March 28, 2006

Pryor, Cashman
410 park Avenue
New York, NY 10022-4441

Dear Rick Purcell,

This letter is a correction to the certified letter for PAU 1-571-116 (Meet the Parents) sent to you on March 7, 2006). To clarify, there are no "attached photocopies" of "the front of the video-cassette tape" or of the "front and side of video-cassette tape cover". The video-cassette came in an unmarked black container.

Sincerely,
/s/ Richard Sharp
Richard D. Sharp
Certifications and Documents Section
Information and Reference Division

United States Copyright Office
Library of Congress, 101 Independenc eAvenue SE,
Washington, DC 20559-6000, www.copyright.gov
[Seal]

January 26, 2007

Joseph Ardito
8 Badeau Place
New Rochelle, NY 10801

Dear Mr. Ardito:

This letter is in response to your request for a search of the Copyright Office Inspection File and Authorization File. The search failed to disclose evidence that anyone has requested to examine of the following work.

MEET THE PARENTS Pau 1-571-116

A search of the Copyright Office Authorization Files disclosed that a copy of this work was requested for litigation purposes in a Copyright Infringement Dispute by the following.

Richard J. Purcell
PRYOR CASHMAN SHERMAN & FLYN
410 Park avenue, 10th Floor

The proceedings have been instituted in the Southern District of NY,

We conducted a careful search of the files at the Copyright Office Deposit Copy Storage Area

which revealed the work was missing from the storage box assigned for this deposit. Because of this the above listed registration is

You may resubmit your request at a later date and we will conduct

SHOULD YOU DECIDE TO DO SO, YOU MUST RETURN THE ENCLOSED COPY OF THIS LETTER AFTER 120 DAYS AND BEFORE 160 DAYS TO ENSURE NO ADDITIONAL FEES FOR LOATING AND RETRIEVING THIS FILE IS APPLIED, PLEASE NOTE HOWEVER THAT OTHER FEES COULD BE DUE FOR PHOTOCOPYING.

Tampering of Federal Evidence:

[Printed label on videocassette]

07-0665-cv Chivalry Film Productions, et al. v. NBC Universal, et al.
Exhibit E to Ferber Declaration, dated June 16, 2006
VHS Copy of 1991 Version of "*Meet the Parents*"

The Independent Inspection of the true label at the Library of Congress:

CEM Productions
"Meet the Parents"
Handwritten:/72 mins./ typewritten [crossed out information] 1991

05Civ.5627(GEL)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X

CHIVALRY FILM PRODUCTIONS
and JOSEPH ARDITO,

Plaintiffs,

v.

NBC UNIVERSAL, INC., et al.,

Defendants.

----------X

DECLARATION IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Preliminary Statement

The plaintiff's independently created copyrighted work entitled "The Tenant" **PAu-2-283-460 dated April 27th, 1998** was stolen in Los Angeles, California, on or about August 21st, 1998 and a copy was returned the first 60 pages were right side up as the next 178 were backwards, also various project outlines were also missing. I notified the LAPD and filed a complaint . After viewing Meet the Fockers I notified the LAPD in reference to the complaint filed back on or about August 21st,1998 concerning the stolen federal copyrights materials. Detective Packman Packer from the LAPD was on the case

however the statute of limitations on the case was running. I cooperated with the investigation and furnished the detective with whatever materials were needed to prosecute the case. However, I firmly believe that due to the numerous studios involved the LAPD declined on pursuing the case.

The Defendants in this case try to subterfuge the fact that plainitff's "Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals were not used in the making of Meet the Parents and Meet the Fockers this denial is absurd. The numerous similarities of scenes and characters prove beyond a shadow of a doubt that plaintiff's Stolen Federal Copyrighted materials entitled The Tenant and/or The Dysfunctionals were in fact used in the making of Defendants projects entitled Meet the Parents and Meet the Fockers.

The following characters and scenes from plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals were independently created by plaintiff on May 15th, 1996 preceding Meet the Parents 2000 in Characters and Scenes by 4 years 6 months and preceding Meet the Fockers by 8 years.

Defendants 1991 distorted VHS Version of Meet the Parents was intentionally devised and used to back date plaintiff's copyright, very few scenes from this 1991 VHS are present in Meet the Parents 2000 and no scenes from this 1991 VHS are present in Meet the Fockers 2004. However, the scenes and characters from plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals are numerous and overwhelming

in both Meet the Parents and Meet the Fockers. It's fair to say that Meet the Parents and Meet the Fockers are a product of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals.

The 1991 distorted VHS which defendants rely on as "The Irrefutable Documentary Evidence" has no real sequel, because everyone including the dog is dead. The purpose of this back dated copyright is quite obvious to conceal , mask and subterfuge the blatant use of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals. Any jury in the United States or throughout the world will come to the same conclusion.

The following Characters and Scenes are from plaintiff's "Stolen Federal Copyrighted Materials entitled - The Tenant and/or The Dysfunctionalsand an independent creation.

The Characters:

The Tenant and/or The Dysfunctionals - CIA Agent, Attorney Character, Psychiatrist Character, Nurse Character, Flight Attendant Character, Psychiatrist Character (Pam), Flight Attendant Character, Michael Angelo of Carpentry Character, Police Officers Character, Animal Shelter Character, Judge Character, Senior Citizen Character, Concerned neighbor Character, Doctor Character, Baby Characters. These Characters were developed on or about May 15, 1996 – 4 years prior to Meet the Parents and 8 years prior to Meet the Fockers.

Characters in The Tenant and/or The Dysfunctionals //***similar***// Meet the Parents and Meet the Fockers are very similar.

Meet the Parents and Meet the Fockers are as follows : – CIA Agent Character, Attorney Character, Nurse Character, Pam, Attorney Character, Psychiatrist Character, Flight Attendant Character, Carpenter Character , Doctors Character, Mother Character, Concerned Neighbor Character, Little Jack Character, Relative Characters, Rusty Characters, Isabelle Character, Jaho Character, Police Officer Character, Animal Shelter Character, Judge Character, Senior Citizen Characters, Relative Characters, Baby Character. Etc.

The Scenes:

Jo Jo nervously practicing in the mirror in a stuttering manner on how, he is going to ask Pam out. // ***similar***// Gregg is at the hospital practicing to a patient on how he is going to ask Pam to marry him. Both scenes when asking take place at a school location. ***(Def Exh. H -PAu-2-423-720 – Def Exh. C –(MTP))***

Stimmy's full luggage scene as he moves into a new house. // ***similar*** // Gregg's full luggage scene going on a trip. ***(Def Exh. J PAu—2-423-720 Def Exh. C (MTP).***

Gregg pulls up to the house and Jack Byrnes moves the curtain viewing Gregg in a cynical manner. //

similar// Stimmy pulls up to the house and the landlord is peeking through the blinds viewing Stimmy "watching his every move" in a cynical manner. ***(Def Exh. H PAu-2-423-720 (Page 88-1st Paragraph) Def Exh. C (MTP) and Def Exh. TXU-742-462)***

Jack Byrnes – What do you drive a Ford, interesting color did you pick it? Only geniuses pick green and you didn't pick it. ***//similar*** //The Landlord's scene is asking Stimmy why did you buy a standard shift? How about if I need to borrow your car? What kind of car do you drive? ***(Def Exh. H-PAu-2-423-720 , PAu 2-283-460 - Def Exh C (MTP).***

Vinny badgered Stimmy on his driving ability, Vinny tells Stimmy once he is already in the intersection to make a turn if he misses the turn he's ridiculed. // ***similar*** // When Gregg is driving and he missed the turn he was also ridiculed by his future in-laws. **(Def Exh. H PAu-2-283-460 – Def Exh. C (MTP).**

Jimmy climbed up on the roof to pursue a nosy neighbor who vanished into thin air. **// similar //** Gregg climbing up on the roof to pursue Jinx who vanished into thin air. ***(Def Ex H-PAu-2-283-460 – Def Exhibit C (MTP).***

The Tenant eavesdropped on the landlord's conversation. ***// similar*** // Gregg eavesdropping on Jack Byrnes Conversation **(Def Exh. H-PAu-2-283-460 – Def Exh. C (MTP)),**

Stimmy is strapped down into a chair with a home made lie detector test to get the truth out. ***//similar*** // Gregg being strapped to an Antique Lie Detector in getting the truth out. ***(Def Exh H. PAu-2-283-460 – Def Exh. C-(MTP)).***

The Tenant and/or the Dysfunctionals have a Hidden Surveillance Camera ***//similar*** // Meet the Parents and Meet the Fockers who also have a hidden Surveillance Camera **(Def Exh H. PAu-2-283-460 – Def Ex C-(MTP)).**

The landlord and his brother are viewed on the hidden surveillance camera, claiming to be innocent and were found guilty by the recorded evidence. // ***similar*** // to Gregg was viewed on the hidden surveillance camera, claiming to be innocent and was found guilty by the recorded evidence. ***(Def Exh H. PAu-2-283-460 –Def Exh. C-(MTP)).***

The landlord had claimed to have taken a shower however, his hair was noticeably dry. ***// similar*** // Gregg also claiming to have taken a shower and his hair was noticeably dry. **(Def Exh H. PAu-2-283-460 – Def Exh. C (MTP)).**

The landlord is a Control Freak // ***similar*** //as Jack Byrnes is also a Control Freak. ***(Def Exh H PAu-2-283-460 – Def Exh. C-(MTP)).***

The tenant is given a tour of the house and it is brought to his attention that the bathroom is under renovation // ***similar*** // Gregg getting a tour of the house it was also brought to his attention that

problem existed in the bathroom. ***(Def Exh. PAu-2-283-460 – Def Exh. C-(MTP)).***

The name Focker in Meet the Parents and Meet the Fockers is prevalent throughout defendants' entire screenplay which in a comical aspect is meant to mean fucker as directed to a person. // ***similar*** // The term fucker is prevalent throughout plaintiff's entire screenplay, meaning one in the same in a comical aspect. ***(Def Exh H PAu-2-283-460 – Def Exh C-(MTP)).***

The term Little Fuckers in the plaintiff's screenplay is intended in a comical aspect to mean children // ***similar*** // The term little fockers is in a comical aspect is meant to mean little fuckers. (Children). ***(Def Exh. H PAu-283-460 – Def Exh. C-(MTP)).***

The landlord use character uses Asian Dialect // **similar** // Jack Byrnes character uses Asian Dialect. ***(Def Exh. PAu-2-283-460 –Def Exh. C-(MTP)).***

The landlord disguises his voice using a variety of accents to keep his identity anonymous. The doctor in the tenant ridicules a southern accent //**similar** // Jack Byrnes tells his travel agent to disguise his voice using a southern accent to keep his identity anonymous. ***(Def Exh H - PAu-2-283-460 Def Exh C (MTP)).***

Vinny dresses up as a male nurse which triggers one of many Gay ridicule scenes, also Tommy being a transvestite attributes to the gay ridicule scenes // ***similar*** // Gregg being a male nurse triggering one of

many gay ridicule scenes throughout defendants screenplay. ***(Def Exh H-PAu-2-283-460 Def Exh C-(MTP)).***

Jack Byrnes ask Gregg a question, is your loved one safe with a stranger? Gregg answers yes as opposed to Jacks answer that is no. ***// similar //*** The Tenant and/or Dysfunctionals – The content of this book will help you develop a sense of cynicism before becoming a statistic yourself – not to trust strangers. ***(Def Exh G – TXU-775-750 – Def Exh C (MTP)).***

Gregg's future Brother-In-Law claims that he saw Gregg going through his wallet and was about to steal his money while in the Tuxedo Shop. ***//similar//*** Vinny stealing money out Stimmy's wallet. ***(Def Exh. H- PAu-2-283-460 – Def Exh C (MTP)).***

The dilated pupil peeking through the blinds would insinuate that the landlord is a pot head. Stimmy's ex claiming to be crack head –overdose drug-related. ***//similar//*** Jack Byrnes claiming that Gregg Focker is a pot head also claims that he works in a hospital looking for access to drugs. ***(Def Exh G TXU-775-759 – Def Exh C-(MTP)).***

Jimmy dragging behind him dismembered tree limbs ***//similar//*** A worker in Meet the Parents dragging behind him some dismembered tree limbs. ***(Def Exh I Paul 2-380-629 – Def Exh C-(MTP)).***

Cheap Bottle of Champagne in The Tenant and/or Dysfunctionals'. ***//similar//*** The Cheap Bottle of Champagne Scene in Meet the Parents. ***(Def Exh H-PAu-2-283-460 – Def Exh C-(MTP)).***

Bestiality Joke in The Tenant and/or The Dysfunctionals' ***//similar//*** Bestiality Joke Meet the Parents. The jokes punch line is one and the same. ***(Def Exh. H- PAu-2-283-460 – Def Exh. C-(MTP)).***

Landlord is time conscience ***//similar//*** Jack Byrnes is also time conscience. ***(Def Exh H- PAu-2-283-460 – Def Exh C-(MTP)).***

Jimmy's wife is stereo-typically permissive ***//similar//*** Dina Byrnes is very permissive. ***(Def Exh H-PAu-2-283-460 – Def Exh- C-(MTP)).***

Carlo's father comes out wearing a woman's robe ***//similar//*** Gregg is also wearing a woman's (Pam's) bathrobe. ***(Def Exh H PAu-2-283-460 – Def Exh C-(MTP)).***

The landlord has rules and regulations of the house ***// similar //*** Jack Byrnes also has rules and regulations of the house. **(Def Exh H-PAu-2-283-460 – Def Exh C-(MTP)).**

The Tenant and/or The Dysfunctionals' use the term mother fucker in a comical aspect. ***//similar//*** Jack Byrnes when claiming that Pam's middle name is Martha – Pamela Martha Focker used in a comical aspect to also mean Mother Fucker. **(Def Exh H-PAu- 2-3283-460 – Def Exh C-(MTP)).**

In the Tenant and/or The Dysfunctionals the landlord claims to be CIA claiming to know Bill Clinton really well and headed for the White House to the oval office to talk about the invasion or coupe. ***//similar//*** Meet the Parents when Gregg falls into the secret room a picture appears of Jack Byrnes

walking next to President Clinton at the White House, another picture depicting Jack Byrnes with a turban on his head with an Arab and another picture with an Army General the intended message was that Jack Byrnes was CIA involved in some sort of military action involving a coupe or invasion of some sort. ***(Def Exh J- PAu 2-423-720 /H PAu-2-283-460 / - Def Exh C-(MTP)).***

Jack Byrnes ask Gregg if he ever watched pornographic movies while taking the lie detector test the needles were jumping ***//similar//*** The landlord watching pornographic movies. **(Def Exh H – PAu-2-283-460- Def Exh C-(MTP)).**

Stimmy is traumatized by the lie detector test venting out to the landlord ***// similar //*** Gregg is traumatized by the lie detector test venting out to Pam. ***(Def Exh PAu-2-283-460 – Def Exh C-(MTP)).***

Jack Brynes jimmies Gregg's luggage to gain access and finds sex paraphernalia which leads Jack to believe that Gregg is a sexual deviant ***//similar//*** The Landlord jimmies Stimmy's door open to gain access and is seen on one occasion going through Stimmy's luggage. The same sex paraphernalia is found to ridiculing sexual deviants in The Tenant and/or The Dysfunctionals while the crew is on vacation. ***(Def Exh PAu-2-283-460 –sex paraphernalia- Def Exhibit F-TXU-742-462 – Def Exh C-(MTP)).***

The landlord wakes up startled in a semi-conscience state and sees a chair planted next to his bed, it's the landlord starring at him sipping coffee ***//similar//***Gregg wakes up startled and sees Jack

Byrnes right next to him. ***(Def Exh G- TXU-775-750 – Def Exh C9MTP)).***

Jo Jo threatens a person as to keep his identity as a CIA confidential or else//***similar***// Jack Byrnes tells Gregg to keep his identity as a CIA confidential or else. ***Def Exh PAu-2-283-460 – Def Exh C-(MTP)).***

Stimmy's Father-In-Law threatens Stimmy concerning his daughter //***similar***// Jack Byrnes threatens Gregg concerning his daughter. **(Def Exh PAu-2-283-460 – Def Exh C-(MTP)).**

The Chaps in The Tenant and/or The Dysfunctionals' feel alienated when no one laughs at their jokes //***similar***// Gregg's feels alienated when no one from the family laughs at his jokes. ***(Def Exh H- 2-283-460 Def Exh C-(MTP)).***

The tenant on numerous occasions states to the landlord "leave me alone" //***similar***// Go away mat in Denny's room symbolizes – leave me alone. ***(Def Exh G- TXU-775-750 – Def Exh C-(MTP))***

Vinny- Michael Angelo of Carpentry – Cabinets from Vienna // ***similar*** // Kevin carpenter Bolivian wooden floors.
(Def Exhi -G-TXU-775-750 – Def Exh C (MTP)).

The landlord refers to Oliver Twist to stay out of his drawers that he will be subject to search and seizure. The mute had ransacked the drawers and was found with the wife's panties over his head. //***similar***// Gregg when going through Denny's drawers is approached by Denny hey! Hey! What are you going through my drawers? Where you sniffing my boxers'

dude? ***(Def Exh H- PAu-2-283-460 – Def Exh – G-TXU-775-750 – Def Exh C (MTP)).***

The tenant had claimed to Carlo that he was petrified of the landlord. ***//similar//*** Gregg had claimed to Pam that he was petrified of her dad. ***(Def Exh PAu-2-283-460 – Def Exh C-(MTP)).***

The tenant is calling his stay at the landlord's house a nightmare. ***//similar//*** Gregg calling his stay at the parents house a nightmare. ***(Def Exh F-TXU-742-462 Def Exh C-(MTP)).***

The tenant and/or Dysfunctionals' elaborate on how History plays an important role in the formulation of their bond with one another, just as a war brings a country together these characters portrayed in this novel show a sick sense of allegiance toward one another. The fidelity creates a bond which in turn forms a crew ***// similar//*** Circle of Trust. ***(Def Exh G-TXU-775-750 – Def Exh C-(MTP)).***

The Tenant and/or The Dysfunctionals' " Watching his Every Move" , " Watching Him" , "Watching with Binoculars" , Brother quite his job to "Watch the Tenant", Stalker, Stalking ***// similar //*** Meet the Parents and Meet the Fockers - I'm watching you! ***(Def Exh H- PAu-2-283-460, Def Exh G-TXU-775-750, Def Exh G – TXU-775-750, Def Exh F-TXU-742-462 – Def Exh C-(MTP)).***

The Tenant and/or The Dysfunctionals' Skimpy bathing suit Scene ***// similar //*** The Meet the Parents' Skimpy bathing suit scene. **(Def Exh G-TXU-775-750 Def Exh C (MTP)).**

The Tenant and/or Dysfunctionals' Volleyball Game scene in where a woman breaks her nose // ***similar*** // The Meet the Parents Volleyball Scene with a nose injury. ***(Def Exh F-TXU-742-462 – Def Exh – C-(MTP)).***

The senior citizens who are cynical pessimist investigate Jo Jo character after witnessing some bizarre behavior in order to find out, whether he is who he says he is. // ***similar//*** Jack Byrnes a cynical pessimist after witnessing some bizarre behavior, investigates Gregg in order to find out if he is who he says he is. ***(Def Exh H – PAu-2-283-460 – Def Exh C-(MTP)).***

Vinny is spelling out Stimmy's name to an official for investigative purposes. // ***similar*** // Jack Byrnes is spelling out Gregg's name to an official for investigative purposes. ***(Def Exh H- PAu-2-283-460*** **– Def Exh C-(MTP)..**

The Tenant and/or The Dysfunctionals' – The investigation concluded that Jo Jo is fabricating. // ***similar*** // The investigation concludes that Gregg is fabricating. (***Def Exh H – PAu-2-283-460 – Def Exhibit C-(MTP)).***

The landlord claims that Stimmy has been nothing but trouble since he came into the house. Jimmy saying this guys referring to his son-in-law has been nothing but trouble since he came into the family. // ***similar*** // Jack Byrnes – Honey this kid has been lying to us since we met him. ***(Def Exh H-PAu-2-283-460 – Def Exh C-(MTP)).***

The Tenant and/or The Dysfunctional "Michael Angelo of Carpentry" orders cabinets from another country Vienna. // ***similar*** // Kevin a carpenter orders wood from another country Bolivia. ***(Def Exh G TXU-775-750 Def Exh C-(MTP)).***

Vinny speaks Asian Dialect // ***similar*** // Jack Byrnes speaking Asian dialect ***(Def Exh H-PAu2-283-460 Def Exh C-(MTP)).***

Vinny says Fucker. // **similar** // Gregg looking for Jinx says fucker in a comical aspect. ***(Def Exh G – TXU-775-750 , Def Exh H – PAu-2-283-460 – Def Exh C-(MTP)).***

The plaintiff in The Tenant and/or Dysfunctionals' receives a call from a concerned neighbor about his dog and the ASPCA // ***similar*** // Jack Byrnes while retrieving his messages receives a call from a concerned neighbor that he found Jinx – Jack comes concluding that Gregg took a cat from the Animal Shelter. ***(Def Exh G-TXU-775-750 – Def Exh C-9MTP)).***

Race home Scene –Vinny's wife pulls up parallel to his car exactly 3 (Three) times, Vinny is trying to get home first to fix the dent, get rid of the evidence and substantiate an alibi // ***similar*** // Jack Byrnes pulls up parallel to Greggs car exactly 3 (Three) times. Gregg is trying to get home first to get rid of the evidence both deal with evidence. ***(Def Exh G TXU-775-750 – Def Exh C-(MTP)).***

Stimmy as he pulls up to the house, he finds his clothes shredded and burnt all over the front lawn in a bizarre manner. The carpentry case the plaintiff

enters his apartment which is in total disarray, it looked as if an earthquake struck. His dog was in the closet. He received a phone call from a concerned neighbor informing him about his dog and the fact that ASPCA was present. // ***similar*** // The Byrnes family comes home and finds the house in a total disaster with the wedding clothes, tuxedos and gown shredded up all over the place in a bizarre manner. Jack realized that the cat was from the Animal Shelter. ***(Def Exh G TXU-775-750 Ex H-PAu-2-283-460, J-PAu-2-423-720, – Def Exh C (MTP)).***

Gregg informed Pam that her father was breaking them apart, that he didn't like him. // ***similar*** // Where as in Jo Jo and Pam's relationship the parents were against it. ***(Def Exhibit H-PAu- 2-283-460 – Def Exh – C (MTP)).***

" The shredded clothes in a bizarre manner leads to the eviction of both the Tenant and Gregg Focker". ***(Def Exh G-TXU-775-750, Def Exh H – PAu-2-283-460 – Def Exh – C- (MTP)..***

The shredded clothes in a bizarre manner leads to the eviction of both the Tenant in "The Tenant and/or The dysfunctionals"; and Gregg Focker in "Meet the Parents". The numerous comparisons alone should substantiate and prove that the defendants beyond any reasonable doubt knew at all times that they were in possession of plaintiffs stolen federal copyrighted materials and used plaintiffs' Stolen Federal Copyright in the making of defendants' projects Meet the Parents and Meet

the Fockers. *// similar //*(**Def Exh G TXU-775-750, Exh H - PAu-2-283-460, Exh J-PAu-423-720 – Def Exh C-(MTP)).**

Dina Byrnes then tells Jack that no one was ever good enough for Pam. *// similar //* Pam's family in the Tenant felt the same way. ***(Def Exh H – PAu-2-283-460 – Def Exh C-(MTP)).***

Eddie is at the airport by himself and Stimmy's girlfriend took off to the airport with Stimmys engagement ring *// similar //* Gregg goes to the airport it appears he is the only one in the airport as he looks at the engagement ring). ***(Def Exh G TXU-775-750 – Def Exh C-(MTP))***

Jo Jo is taken into custody from the plane. A crew member is arrested and carried off by two police officers restraining both his arms and legs as he is acting like a raving lunatic. *// similar //* Gregg has a problem on the flight and is arrested and carried off the plane by two police officers restraining both his arms and legs as he is acting like a raven lunatic. ***(Def Exh H-PAu -2-283-460 – Def Exh C-(MTP)).***

Jack Byrnes driving erratically sped to the airport and jackknifed his car in front of the entrance to the airline. A police officer walked up and said to him you can't park there. Jack replied tow it. *// similar //* Jimmy driving erratically sped to the hospital and jackknifed in front of the emergency entrance. A police officer walked up and said to him you can't park there. Jimmy's reply was yeah right! ***(Def Exh H -PAu-2-283-460 -Def Exh – C (MTP)).***

Jo Jo is interrogated and in light of the investigation is set free. Stimmy is also cuffed to a chair and in light of the investigation is set free. // ***similar*** // Gregg is interrogated and cuffed to a chair declaring his innocence and in light of the investigation is set free. ***(Def Exh H- PAu-2-283-470 – Def Exh C- (MTP)).***

Stimmy goes on to Meet another Dysfunctional family, upon entering the premises he notices a picture on the wall which resembled the owner. Stimmy could have sworn while looking around the apartment he saw the eyes in the picture moving. It was confirmed that the landlord was watching him from behind the picture as the landlord starting conversing with Stimmy from behind picture. "Watching Him" ***(Def Exh H-PAu-2-283-470)***

Gregg states to Jack do I think you're a psycho? Yes // ***similar*** // Vinny's stalking his boss and the boss calls him a psycho, Stimmy calling him a psychotic. ***(Def Exh H- PAu-2-283-460 Def Exh C (MTP)).***

Jo Jo at the end of "The Tenant and/or The Dsyfunctionals is in the process of developing a relationship with Pam the Psychiatrist as Stimmy is off to meet another dysfunctional family // ***similar*** // Gregg returns to the house and continues his relationship with Pam and Jack Byrnes is in the process of meeting another dysfunctional family //"The Fockers" //. ***(Def Exh H –PAu-2-283-460 Def Exh. C-(MTP)).***

Jack Byrnes during the credits plays the video from the hidden surveillance camera and verifies that Gregg was guilty of flushing the toilet. //similar// Stimmy playing the video from the hidden surveillance camera which verifies that Vinny was guilty of stealing his money. ***(Def Exh. H-PAu-2-283-460 – Def Exh C (MTP)).***

Gregg doing karate moves and screams ***// similar //*** Vinny doing karate moves and screams ***(Def Exh. H-PAu-2-283-460 – Def Exh-C(MTP)).***

There are many more scenes, however time is of the essence.

The Tenant and/or The Dysfunctionals' Characters: CIA Character, Psychiatrist Character, Attorney Character, Theologian/Monk Character, Michael Angelo Of Carpentry Character, Police Officer Character, Correction Officer Character, The In-laws Character, Captain Character, Judge Character, Senior Citizen Characters.

Meet the Fockers Characters as follows:

CIA Character, Nurse Character, Pam Character, Mother Character, Attorney Character, Psychiatrist Character, Little Jack, Isabella Character, Rusty Character, Jaho Character, Ordained Minister Character & Carpenter Character, Relative Characters, Police Officer Character , Correction Officer Character, Judge

Character, Senior Citizen Characters. Captain Character.

Characters in the Tenant and/or The Dysfunctionals // similar // Characters in Meet the Fockers

The Scenes from The Tenant and/or The Dysfunctionals //similar// Meet the Fockers

The Scenes:

A mother in agonizing pain is frantically seeking a doctor to deliver her baby. A doctor cannot be found and Gregg is informed that he has to deliver the baby. The parents are concerned of his lack of medical qualifications and competence. However, the delivery goes well. // ***similar*** // Jimmy's wife in agonizing pain is frantically seeking her doctor to deliver her baby. The doctor comes in late Jimmy aware of the doctor's medical mal practice is concerned about his competence. However the delivery goes well. **(Def Exh. H-PAu-2-283-460 – Def D (MTF)).**

Little Jack was brought into Meet the Fockers for the purpose of incorporating the Sign language, Mammary Gland, Gay ridicule, Ferber Focker Method, "Scar Face say hello to my little friends" . and to get some of the sexually explicited materials out for instance seeing Isabellas Breast and making the using his tongue and mimicking his hands in an what appears to be sexual.

Roz the Psychiatrist was brought in to bring in sexual situations on an educated level

low tone // Exhibition // Sex // First time details etc// emulating Pam the psychiatrist.// Ferber-Focker method in growing up children.

Jack Byrnes is teaching Little Jack sign language by showing him cards. When Gregg appears Jack shows little Jack a card with a picture of a Nurse on it. Little Jack laughs because as Jack explains to Gregg that the nurse card only comes in one gender. Gay Ridicule // ***similar*** // The landlord tells Stimmy he's got a hot date for him a Nurse – Stimmy thinking a nurse could only be a female and when he views Vinny dressed up in a nurses uniform with a wig on. – Gay Ridicule - **(Def Exh G – TXU-775-750 – Def Exh D (MTF)).**

Dina this is the highlight of our twilight // ***similar***// Members would always be ready for something out of the ordinary like the twilight zone or outer limits. **(Def Exh H- PAu-2-283-460 – Def Exh D (MTP)).**

Jack develops a Mammary Gland to breast feed little Jack however, while in the RV (**deleted scene**) Jack ask Gregg to feel how real the breast feel. While Gregg was feeling the breast Dina and Pam walked in startled to witness such bizarre behavior. // ***similar*** // Vinny going over the bridge making out with a blow up doll acting as if she were real. Vinny acted as if it were his date as he began to make out with a doll, when the wig fell off the toll clerk was startled by the bizarre behavior. Anyhow the intent of the joke is one and the same. **(Def Exh. PAu-2-283-460 – Def D (MTF)).**

Bernie Focker doing karate outside his house // ***similar*** // Vinny doing kararte **(Def Exh H-PAu-2-283-460 –Def D (MTF)).**

Fockers make sleeping arrangements , Jack Byrnes wants to sleep in the RV. // ***similar*** // Vinny tells Stimmy he could sleep anywhere sometimes he sleeps in the car. **(Def Exh G – TXU-775-750 – Def Exh D (MTF)).**

Byrnes family pulls up to the house and they get a tour – It was explained that the upstairs was being renovated // ***similar*** // When the landlord gave Vinny a tour of the house and explained that the bathroom was in the process of renovations. **(Def Exh H-PAu-2-283-460-Def D (MTF)).**

Bernie Focker is bragging about his Stamina // ***similar*** // Mary is bragging about Jo Jo's stamina. **(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).**

When Isabelle was introduced at the dinner table little Jack began making tongue movements and mimicking his arms and hands to feel // **similar** // Vinny starring and mimicking his tongue movements and mimicking his arms and hands the intent of the joke sexual deviant. ***(Def Exh H-PAu-2-283-460 – Def Exh D-(MTF)).***

Isabelle looks at little Jack and actually says handsome little fucker // ***similar***// Fucker being prevalent throughout the script as a comical aspect **(Def Exh G – TXU-775-759 – Def Exh D(MTF)).**

Bernie said Gay will be the official quarterback he'll go both ways. Jack said I'm sure he does. //

similar // Stimmy thought maybe this chap went both ways. **(*Def Exh H-PAu-2-283-460 – Def Exh D – (MTF)).***

Bernie Focker say to Jack Byrnes look at those pecks. // ***similar*** // Father in The Tenant and/or The Dysfunctionals is a well built man. **(*Def Exh H – PAu-2-283-460 – Def Exh D (MTF)).***

Macho Football

Bernie Focker paints his face // similar // Father paints his face. **(Def Exh H- PAu-2-283-460 – Def Exh D (MTP)).**

Jack and Gregg in football huddles whispering there plan // ***similar***// Brothers in a football huddle whispering their plan. **(Def H- PAu-2-283-460 – Def D (MTF)).**

Bernie Focker does an Indian War Dance to rowel himself up while playing football // ***similar*** // It sounded like an Indian War dance before the attack. **(*Def Exh H –PAu-2-283-470 – Def Exh D (MTF)).***

Jack Byrnes gets intercepted and tackled by Bernie // ***similar*** // Tommy getting intercepted and tackled. ***(Def Exh F TXU-742-462 – Def Exh D (MTF)).***

Jack Byrnes – Can I get some privacy? // ***similar*** // I have to talk to my brother in private stop

eavesdropping. ***(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).***

Jack Brynes is eaves dropping as he bends over trying to listen by the door // similar// Stimmy listening by the door. ***(Def Exh -PAu-2-283-460 – Def D (MTF)).***

Ferber Method don't pick the baby up when he cries // ***similar*** // A baby is crying awaiting a response. The parents in fetal position are also crying with no intention of picking the baby up. Dysfunctional v. Rational. ***(Def Exh H- PAu-2-283-460 – Def Exh D-(MTP)).***

Ferber –Focker Method ***//similar//*** Dysfunctional v. Rational Method – we will have an opportunity to study some of the bizarre behaviorism and abnormal reactions of the dysfunctional as well as the normal people of society, I would like at this point to return to the crying chap and focus in on the newborn, who will have to endure being raised in a dysfunctional home. ***(Def Exh H – PAu-2-283-460 – Def Exh C –(MTF)).***

Roz Focker states Jack is in denial // ***similar*** // The parents that finally realize through failures and tragedies of their offspring that something is indeed wrong and continues to go through life turning a blind eye are usually to blame. The lack of understanding and stubbornness to deal earnestly with this problem creates the barriers and inability for these chaps to function rationally in a normal society. ***(Def Exh G- TXU-775-750- Def Exh D- (MTF)).***

Jack Brynes talks about his family legacy // ***similar*** // The parents who go through life subterfuging their guilt without any attempt or reconciling differences, have not learned anything. They only condone the behavioral pattern that will eventually destroy their families and destroy the lives of the next generation. ***(Def Exh G –TXU-775-750 – Def Exh D (MTP)).***

Roz the psychiatrist tries to get to the foundation of the problem // ***similar*** // Pam the psychiatrist tries to get to the foundation of the problem.
(Def Exh H PAu-2-283-460 Def Exh D (MTF)).

Roz what was his childhood like? Roz goes into Jack's childhood thinking all he needed was a hug. // ***similar*** // Pam what was your childhood like? ***(Def Exh H – PAu-2-283-460 – Def Exh D (MTF)).***

Denny was away at Military School // ***similar*** // Jo Jo was raised quasi-military. ***(Def PAu – 2-283-460 – Def Exh D-(MTP)).***

Jack Byrnes and his wife Dina are in the downstairs bedroom listening to sounds of a couple in ecstasy making passionate love // ***similar*** // real estate agent and potential buyers hear the sounds of a woman in ecstasy making passionate love. ***(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).***

Jack Brynes gives Gregg a truth serum drug and his true feelings begin to emerge. // ***similar*** // The liquor began working like a "Truth Serum" as the chaps true feeling began to emerge. ***(Def Exh H-PAu 2-283-460 – Def Exh D (MTF)).***

Gregg passes out on the floor // ***similar*** // Jo Jo passes out on the floor **(Def Exh PAu-2-283-460 – Def Exh D –(MTF)).**

Roz explained to Gregg your father it would make good conversation (sex) on who was the first. // ***similar*** // Jo Jo at the dinner table cued in on the topic of conversation at the dinner table who was the first time. ***(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).***

Richard liked details // ***similar*** // Roz claimed she liked details. ***(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).***

Bernie Focker a rebel , activist hippy // ***similar*** // Jo Jo one of the sons had a rebel type of attitude, finding most of the ordinances concerning rules and regulations totally abnormal and out of touch with reality, mocking such demented behavior – a sort of rebellion against the absurdity of such dysfunctional behavior. ***(Def Exh H-PAu-2-283-460 – Def Exh D (MTF)).***

Bernie Focker an Activist //***similar***// Baffled about the Captains arrest , Jo Jo began questioning whether or not the police acted properly gathering the liberals on the beach. After learning the ground Jo Jo aborted the matter of righteousness. Jo Jo faded into the crowd to avoid any negative exposure. ***(Def Exh H- PAu- 2-283-460 – Def Exh D (MTF)).***

(Deleted Scene) Defendants' Highway Cop – stay in the car. Bernie jumps out of the car and start running up to the cop.// ***similar*** // Keep your hands

on the steering wheel. Vinny jumps out of the car and runs up to the cop. The cops draw their guns. ***(Def Exh H-PAu-2-283-460 – Def Exh D – (MTF)).***

Defendants' Police Officer – Didn't I tell you to stay in the car ? What seems to be the problemo? Speeding going 55 in 45 mph zone .//similar// Didn't I tell you to stay in the car? What seems to be the problem? Speeding going 60 mph running steady red lights and driving recklessly, I say that constitutes a major problem. **(Def Exh H- PAu-2-283-460 – Def Exh D- (MTP)).**

Gregg while in custody sees Jack and starts running trying to get Jacks attention. The officer chases after Stimmy who was taken down with a Tazar gun // ***similar*** // Officer chases after Vinny trying to escape custody as he's taken down with a tranquilizer gun. ***(Def Exh H-PAu-2-283-460-Def Exh D-(MTP)).***

Jack Byrnes approaches the officer and shows his identification A "Man of Influence". The officer looks at the identification that states retiree. CI what? What are you going to show me next your AARP card ? // similar // Vinny flicking his wallet to his date to give the date some inclination that he was a "Man of influence". Are you talking to me? (Robert De Niro Impersonation). I'm CIA baby! Dates reply – Listen, Elliot Nest just drop me off!
Def Exh H – PAu-2-283-460 – Def Exh D (MTF)).

Jack claims that if the officer doesn't stand down he'll be working in an old age home // ***similar*** // Vinny telling his date that those cops do not know

who they are messing with that they'll be working the beat in the fucking circus. Mentality is similar. ***(Def Exh H- PAu 2-283-460 – Def Exh D (MTF)).***

(MTF) Cop hits Jack Byrnes with a stun gun taken him down with a few volts. // ***similar*** // Stimmy is hit with a stun gun taken him down with a few volts. ***(Def Exh H – PAu-20283-460 – Def Exh D (MTF)).***

(MTF) Cop goes into the RV and comes out with the Rubber Booby and finds what he believes to be pornography tapes in the trunk of the car and explains this is what you find behind the blue velvet ropes – the cop is led to the conclusion that he is dealing with sexual deviants // ***similar*** // Cops finding 3 rubber dolls and semen on the seats of the car is led to the same conclusion he is dealing with a sexual deviant. The encompassing of porn tapes, rubber booby, semen and rubber dolls all encompass the same effect the ridiculing of a sexual deviant in a comical aspect. ***(Def Exh H- PAu 2-283-460 – Def Exh D-(MTF)).***

<u>Deleted Scenes:</u>

MTP – Cop - Mr. fucker remain in the vehicle // ***similar***// Fucker referring to individuals in a comical aspect. ***(Def Exhibit H-PAu-2-283-460 – Def Exh D (MTF)).***

MTP – Cop - You want to Dance do si do (square dance)
// ***similar*** // Jimmy in the hospital what's this look like a fucking square dance. ***(Def Exh I- PAu-2-380-720 - Def Exh D (MTF)).***

MTP Cop- Poppa Freak and Baby freak out for a Sunday drive and Mrs. Freak ***//similar//*** The Tenant and/or The Dysfunctional Cops - Freaks of Nature were exposed and labeled sexual deviants. ***(Def H-PAu-2-283-460 – Def D (MTF)).***

Deleted Scene cop claims they are doing interstate porn trafficking these are the kinds of videos you find behind the velvet rope // ***similar*** // Stimmy is taken down to the peep parlor.
(Def Exh H- PAu 2-283-460 – Def Exh D (MTF)).

MTF Child services // ***similar***// Child Services if this type of warped behavior is being used as a form of conditioning or discipline in your household, stop right here and notify the child abuse hotline. If you're an adult get out! ***(Def H- PAu-2-283-460 – Def D – (MTP)).***

Baby Jack puts on Scar Face with Al Pacino " Say hello to my little friends" // ***similar*** // Say hello to my little friends is dialogue – Al Pacino – Jimmy the father watched Scar Face with Al Pacino on T.V. Vinny talked like Al Pacino in the restaurant. ***(Def Exh G – TXU-775-750 – Def Exh D (MTP)).***

Deleted Scene – Bernie Focker states to Jack we all have our issues // ***similar*** // The pattern of behavior in this novel is called "Sick Humor" the actions of these characters creates the type of ambivalence and animosity that severs numerous relationships as you will see, instilling apprehension, fear and anxiety that creates the onsets of the chaotic environment, The characters portrayed in this story all suffer from

a variety of disorders which makes this novel entertaining. ***(Def Exh G –TXU-775-750 – Def Exh D (MTF)).***

Relative – Barry Focker (In-Law) Looked like a typical sex degenerate, with his stalker stares // ***similar*** // starring in a lecherous manner, the woman noticed the perverted stares from the stalker – The tenant and/or Dysfunctionals' ridicules this type of behavior throughout the projects. ***(Def Exh H-PAu-283-460 – Def Exh D (MTF)).***

Kevin became an ordained minister when he was talking to Isabelle he claimed Gregg had good taste and threw his collar away // ***similar*** // Theologian - monk who studied theology and then went after women. - ***(Def Exh H- PAu 2-283-460 – Def Exh D (MTP)). (The theologian character was developed through biblical references because the tenant was created to ridicule all the freaks and outcast of society and dysfunctional families in society.***

Kevin in meet the parents who got you into carpentry? Iguess I would have to say Jesus "if your gonna follow in someone's footsteps who better than Christ" Kevin explains in biblical reference - why he was a carpenter his analogy takes all the biblical references from The Tenant and The Dysfunctionals (***However biblical reference would be /Jesus /last supper/ grace at the table, mother must have carried the cross, the cock crowed until it was singing a song)***

Deleted Scene Rusty Bridge – spitting on the floor – taking his son to hooters to look at girls for some

family bonding "Dysfunctional" // ***similar*** // Vinny spitting on the floor when he's talking to his boss in the dinner and taking Stimmy to the peep parlors to look at girls. ***(Def Exh H –PAu-2-283-460 - Def Exh D (MTF)).***

Meet the Parent and Meet the Fockers are a product of plaintiffs Stolen Federal Copyrighted Material independently created entitled The Tenant and/or The Dysfunctionals the characters portraying the awkward and humorous situations were developed 4 years prior to Meet the Parents and Meet the Fockers. The resemblance is overwhelming.

The Defendants rely on as "**Indisputable Documentary Evidence**" Meet the Parents a copyright VHS registered in 1991 prior to plaintiffs copyrights. However, the defendants use the name and a few scenes with no sequel in relation to Meet the Fockers because everyone in this Meet the Parents 1991 version is dead including the dog.

Meet the Parents distorted VHS (1991) Copyright by Gregg Glienna and Mary Ruth Clarke

A distorted VHS that looks like it was shot in the 60's with no written copyright the credits seem to be the only undistorted scene. The very few scenes characterized only in Meet the Parents with no scenes in Meet the Fockers. However, plaintiff's "Stolen Federal Copyrighted Scenes and Characters are numerous and excessive in both Meet the Parents and Meet the Fockers. The plaintiff's sequel is used in meeting another dysfunctional family. However, defendants had more than enough of

material in plaintiff's stolen Federal copyrighted materials entitled The Tenant and/or The Dsyfunctionals whatever the defendants didn't extract out of the plaintiff's stolen Federal Copyrighted Materials in Meet the Parents they used in Meet the Fockers that's why it is fair to say that defendants projects Meet the Parents and Meet the Fockers are a product of plaintiff's "Stolen Federal Copyrighted Materials" The Tenant and/or The Dysfunctionals this back dated 1991 VHS only proves that the defendants objective was to subterfuge and conceal the use of plaintiff's Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals.

Meet the Parents VHS (1991)

The movie narrated at first by a gas station owner, A normal family until the end, a stick is thrown into the lake for the dog to fetch the dog drowns. The sister commits suicide and is found swinging from a rope in her bedroom. (Sister's dead). The father a retired gas station owner comes down the stairwell with a shotgun and accidentally kills his wife and other daughter (Both mother and daughter are dead) and supposedly the father dies of a heart attack in the process.

This blockbuster has no sequel because everyone in this project is dead including the dog. However, a sequel was in the making for this 1991 blockbuster. – The sequel once again narrated by a gas station owner: A totally different man with a totally different chain of events taking his children to the circus. "**A Trip to the Circus**" another tragedy

that will most likely resemble the same outcome of the 1991 MTP everyone will wind up dead.

The "Stolen Federal Copyrighted Materials" were independently created by the plaintiff and entitled The Tenant and /or The dysfunctionals.

The Characters:

CIA Agent, Nurse Character, Mother (submissive character) Attorney Character, Doctor Character, Carpenter Character, The Theologian / Monk Character Baby Character, Police Character, Judge Character, Correction Officer Character, Flight Attendant Character, Detective Character, Relative Characters, In-Law Characters. **Importantly to note,** that **none** of these Characters are portrayed in the distorted 1991 VHS copyright of Meet the Parents by Gregg Glienna and Mary Ruth Clarke's version.

The defendants also fail to mention that the scenes below are from the "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals that were independently created by the plaintiff and entitled "The Tenant" and/or The Dysfunctionals'. **Importantly to note,** that **none** of these scenes below are portrayed in the distorted 1991 VHS copyright of Meet the Parents by Gregg Glienna and Mary Ruth Clarke

The Scenes:

The initial meeting where Jack Byrnes/landlord mans a window moving the curtain/blinds with a

cynical and apprehensive attitude in meeting (MTP/ Tenant) Scene, Full luggage (MTP/Tenant) Scene, Car Scene – What kind of car do you drive/ what do you drive a standard or automatic (MTP/Tenant) Scene, Hidden Surveillance Camera (MTP/Tenant) Scene, Frayed Wire Spark (MTP/Tenant) Scene, Lie Detector Test (MTP/Tenant) Scene, Focker /Fucker both relating to persons in a comical aspect (MTP/MTF/Tenant) Scene, Little Fockers/Little Fuckers both relating to children in a comical aspect (MTP/MTF/Tenant) Scene, Bestiality Joke (MTP/ Tenant) Scene, Roof (MTP/Tenant) Scene, Volleyball (MTP/Tenant) Scene, Skimpy Bathing Suit (MTP/ Tenant) Scene, Ransacking the luggage bag (MTP/Tenant) Scene, Jimmying the Locks open (MTP/ Tenant) Scene, Renovations (MTP/ MTF/ Tenant) Scenes, Asian dialect (MTP/Tenant) Scene, Disguise Voice (MTP/Tenant) Scene, Southern Dialect (MTP/Tenant) Scene, I'm Watching you (MTP/MTF/Tenant) Scenes, Investigative (MTP/MTF/Tenant) Scenes, Interrogation (MTP/MTF/ Tenant) Scenes, Gay Ridicule (MTP/MTF/Tenant) Scenes, Pot head dilated pupils pill popper crack head drug related (MTP/Tenant) Scenes, Spew (MTP/Tenant) Scene, Animal Shelter/ASPCA-(MTP/Tenant) Scene, Shredded Clothes in a bizarre manner which leads to both the tenants eviction and Gregg's eviction (MTP/Tenant)Scene, Race Home Scene (driving erratically) in where they pull up parallel exactly 3 times to try to get home to get rid of the evidence (MTP/Tenant) Scene, Time Conscious (MTP/Tenant) Scene, Karate (MTP/MTF/Tenant) Scene, Being carried away by police by arms and legs while acting like a raving lunatic (MTP/Tenant) Scene. Airport Scene which results in arrest (MTP/Tenant) Scene,

Ferber/Focker/ Dysfunctional/Rational method in bringing Children up, Sign Language making facial expression while mimicking arms and hands with the intent of a sexual gesture for comical purposes (MTF/Tenant) Scene, Military School – Quasi Military (MTP/Tenant) Scene, Truth Serum where true feeling emerge (MTP/ Tenant) Scene, Square Dance (MTF/Tenant) Scene, Hospital baby being born both families worried about the competence of the person delivering. (MTP/ Tenant) Sex Exhibitions (MTF/Tenant) Scene, Sex talk when was your first time and details (MTF/Tenant) Scene, Barry Focker in-law typical sexual deviant stalker that is ridiculed in the Tenant and/or The Dysfunctionals (MTF/Tenant) Scene. Jackknifing the car (MTP/ Tenant) Scene, Ordained Minister – The Theologian / Monk (MTF/Tenant) Scene, Psychiatrist Scene getting down to the foundation of the problem . (MTF/ Tenant) Scene. Psychiatrist Scene going into childhood (MTF/Tenant) Scene, Stun Gun (MTF/Tenant) Lazar Gun (MTF/Tenant) Scene, Police Chase (MTF/Tenant) Scene, Mammary Gland and Rubber Dolls (MTF/Tenant) sexual deviant Scene, Judge (MTF/Tenant) Scene.

The defendants rely on the distorted VHS MTP 1991 version claiming that the plaintiff's copyright infringement case is frivolous – and the defendants' feel they are ripe for summary judgment – The defendants contentions are absurd and any juror in the world after viewing the characters and scenes will only come to one conclusion. That the defendants acted in concert knowingly and willing in the use of plaintiff's stolen federal copyrighted materials entitled The Tenant and/or The Dysfunctional in the making of their projects entitled

Meet the Parents and Meet the Fockers and that the defendants should not prevail, profit or benefit from a crime .
See Character and Scene Similarity.

The very few scenes are portrayed in Meet the Parents and no scenes are portrayed in Meet the Fockers from the back dated VHS copyright of Gregg Glienna and Mary Ruth Clarke that was solely used in a premeditated scheme carefully devised in an attempt to subterfuge and mask the blatant use of plaintiffs "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals in the making of defendants projects "Meet the Parents" and "Meet the Fockers".

The reason why "The Tenant and/or The Dysfunctionals fit so squarely into Meet the Parents and Meet the Fockers is because both project : combined are a product of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals.
See Character and Scene Similarity

The plaintiffs independent creation of The Tenant and/or The Dysfunctionals' needs no sequel to further prove the case because Meet the Parents and Meet the Fockers are a product of plaintiff's Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals. However, in further proving consistency the tenant after being evicted from the premises seeks to meet another dysfunctional family which gives rise to the defendants Meet the Fockers.

Facts

The defendants working in concert used very few scenes in Meet the Parents and no scenes in Meet the Fockers from the pre-dated 1991 VHS copyright the only purpose of this back dated copyright was to mask, conceal and subterfuge the unlawful use of plaintiffs "Stolen Federal Copyrighted Materials" which were independently created and entitled The Tenant and/or The Dysfunctionals. It is quite clear and evident in these proceedings that Meet the Parents and Meet the Fockers are a product of plaintiffs "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals. The "**similarities of scenes and characters are overwhelming**" and it is quite clear and evident that the defendants acting in concert used the pre-dated VHS copyright of 1991 to mask their unlawful conduct in using the plaintiffs "Stolen Federal Copyrighted Materials" The Tenant and/or The Dysfunctionals in the making of there projects entitled Meet the Parents and Meet the Fockers.

These Character and Scenes bear extreme resemblance which include and are not limited to The CIA Character, The Pam Character, The Psychiatrist Character, The Nurse Character, The Police Character, The In – Law Characters , The Michael Angelo Of Carpentry Character, The Theologian Monk Character - The initial meeting scene (cynical and apprehensive as he waits the arrival looking out the window, lie detector test scene, the hidden video camera scene, the volleyball scene, the skimpy bathing suit scene, the cheap bottle of champagne scene, the bestiality joke scene, karate scenes. Eavesdropping scenes, investigation

scenes, incarceration scenes, police scenes, race home scenes, pulling up parallel scenes, shredded clothes in a bizarre manner scene, concerned neighbor scene, dilated pupil scenes – pot head, Carpentry scene wood from another country, driving erratically scenes, disguise voice scene, football scenes, stalking scenes, Pamela Dysfunctional method in bringing up children, lazar stun gun scene, Asian dialect scene, airport scene, truth serum scene, square dance scene, jackknife the car scene, The friction between the landlord and tenant – the animosity and ambivalence that leads to a chain of event in where the tenant is terrified and thinks the landlord is a stalker, the drawer scene, ransacking belonging scene, renovation scene, I'm watching you scenes, fucker referred to an individual in a comical aspect , little fucker referred to children in a comical aspect the same as Mother fucker in a comical aspect. The tenant leaving to meet another dysfunctional family squarely fits into Meet the Fockers.

"Extremes in Revisions"

The defendants is the ultimate product of a vaguely described theft, Plaintiffs have curiously alleged the defendants "went through extremes in revisions and manipulations in an attempt to conceal and subterfuge said crime by revising said screenplay".

When plaintiff alleges that the defendants "went through extremes in the revisions and manipulations in an attempt to conceal and subterfuge said crime by revising said screenplay the plaintiff means that the defendants knew at all times that they were in possession of plaintiff's "Stolen

Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals. The plaintiff used the backdated copyright with the intent of masking and subterfuging the theft and changed some scenes around.

Revisions and manipulations are obvious:
For instance : The frayed wire and spark scene used for plaintiff's lie detector test was used to start the fire in the yard. However, the use of the lie detector test whether it is home made or Antique still serves a **similar** purpose to seek the truth.
The use of the mammary gland as opposed to the use of the rubber dolls which again is revised however the rubber dolls and the mammary gland serve a **similar** purpose through police investigation which labeled the characters sexual deviants one and the same.
The Ferber –Focker method as opposed to the Dysfunctional - Rational method which is self evident in the novel as they still serve a **similar** purpose.
The defendants use a sex therapist to bring plaintiff's "Stolen Federal Copyrighted Materials in for a PG rating.
The defendants bring in little Jack to bring in sign language, Ferber-Focker Method, Scar Face, the tongue and mouth movement and mimicking of his arms and hands are used by little Jack to bring out the sexual deviants that the Tenants ridicule however the overall message is **similar**.

The plaintiff has proven numerous and overwhelming similarities in scenes and characters in which a jury would have no problem rendering a verdict on behalf of the plaintiff.

The plaintiff through discovery would most likely be able to reveal the theft ring involved in the plaintiff's "Stolen Federal Copyright Materials entitled The Tenant and/or The Dysfunctionals. The plaintiff believes that this copyright theft ring is highly sophisticated and if given the opportunity through discovery the plaintiff believes that these perpetrators will be brought to justice.

The plaintiff also believes that the defendants' in this action know exactly where the plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dsyfunctionals came from and used the back dated 1991 distorted VHS copyright of Gregg Glienna and Mary Ruth Clarke in a blatant attempt to mask, conceal and subterfuge the blatant use of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals into the making of Meet the Parents and Meet the Fockers.

The theft occurred on or about August 21st, 1998 the police report number 980626165 the project stolen was entitled The Tenant- **(PAu-2-283-460 dated April 27th, 1998).** After viewing Meet the Fockers and then viewing Meet the Parents. I constantly badgered Robert Epstein into helping me formulate a complaint against the defendants he constantly procrastinated so I decided to begin formulating on my own.

When Robert Epstein found out that I was formulating a complaint he told me that he would notify Rico his friend from L.A. in where the actual theft occurred, However, prior to any phone call

Robert Epstein explained to this plaintiff, that he would have to sign a retainer. Robert Epstein also informed me that during the conversation I would have to remain silent. The gist of the conversation seemed somewhat tailored as Rico would go quiet before answering each question and took his time answering. However, during the course of the telephone conversation Rico made it clear that the script had been changed as he informed Robert Epstein to read it. Rico Semonini during this conversation made it quite clear and evident that Robert Epstein was also in possession of plaintiff's "Stolen Federal Copyrighted Materials entitled The Tenant and /or The Dysfunctionals.

Prior to any theft occurring on or about January of 1997 Robert Epstein constantly badgered me on reading my script entitled The Tenant and/or The Dysfunctionals (**TXu -775-750 dated December 24th, 1996**). Robert Epstein promised this plaintiff that he would never divulge any of the content in said project, claiming that he was an attorney vowing that he would keep all materials confidential. Robert knew that I was in the process of starting my own film production company and wanted to break into the film industry with this project. Robert Epstein also knew he would be of counsel to my production company, I believed in Robert Epstein because I thought he was my friend.

Robert Epstein was the only person in possession of plaintiff's copyrighted novel The Tenant and/or The Dysfunctionals **TXU-775-750 dated December 24th 1996)** prior to the theft in L.A on August 21st, 1998 of plaintiff's Stolen Federal

Copyrighted Material entitled The Tenant **(PAu-2-283-460 dated April 27th, 1998).**

However, Robert Epstein helped me formulate a complaint against the defendants in doing the jurisdiction portion, attorney fees cause of action and reverse passing off in the Lanham Act. Robert Epstein had also informed me that **John Hamburg a writer on both Meet the Parents and Meet the Fockers** went to school with Adam Schlesinger an attorney from the office.

During the course of the summary judgment I asked Robert Epstein for an affidavit concerning the said conversation with Rico Semonini. Robert Epstein refused to give an accurate account of said conversation concerning Rico Semonini. This plaintiff firmly believes that a sophisticated theft ring is involved with the "Stolen Federal Copyrighted Materials" and the defendants in this case have acted jointly in concealing, masking and subterfuging the blatant use of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/ or The Dysfunctionals in the making of Meet the Parents and Meet the Fockers.

The overwhelming similarities are quite clear and evident that the defendants in this case used plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals in the making of defendants projects entitled Meet the Parents and Meet the Fockers.

The back dated 1991 VHS copyright of Gregg Glienna and Mary Ruth Clarke's purpose for the defendants in this case was to pre-date plaintiff's

independent creation "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals. The backdated 1991 copyright has very few scenes in Meet the Parents and no scenes in Meet the Focker. However, plaintiffs "Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals has numerous and overwhelming comparisons scenes and characters to the defendants Meet the Parents and Meet the Fockers. It is fair to say that Meet the Parents and Meet the Fockers are a product of plaintiff;s Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals. The sequel intended for The Tenant and/or The Dysfunctionals is to Meet Another Dysfunctional Family which squarely fits into Meet the Fockers. There is no sequel for the back dated copyright because everyone including the dog is dead.

Whatever the defendants didn't extract from plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals In the making of Meet the Parents they used in the making of Meet the Fockers. That's why it is fair to say that defendants projects entitled Meet the Parents and Meet the Fockers are a product of plaintiff's Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals.

Conclusion: Meet the Parents and Meet the Fockers are a product of plaintiff's independently created copyrights (Stolen Federal Copyrighted Materials) entitled The Tenant and/or The Dysfunctionals.

The reason why Meet the Parents and Meet the Fockers enjoyed worldwide success is because they used all the materials from plaintiff "Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals. The overwhelming comparisons in scenes and characters are proof.

Defendants' rely on the Independent creation in this case however it is abundantly clear that Meet the Parents and Meet the Fockers are a product of plaintiff's Stolen Federal Copyrighted Materials entitled The Tenant and/or The Dysfunctionals. The defendants in the film industry have access to all different copyrights and contracts, the defendants use of the 1991 VHS use very few scenes in Meet the parents and no scenes in Meet the Fockers concerning this backdated distorted VHS 1991 which has no sequel for Meet the Fockers because everyone in the family including the dog is dead.

The only real purpose of this distorted 1991 backdated VHS was to mask, conceal and subterfuge the unlawful use of plaintiff's "Stolen Federal Copyrighted Materials" entitled The Tenant and/or The Dysfunctionals.

CONCLUSION

For the foregoing reasons, plaintiff respectfully request that this court deny defendants motion for summary judgment in it's entirety and grant the plaintiffs such other and further relief as the court deems just and proper.

Dated: New York, New York
September 2, 2006
/s/ Joseph Ardito
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Table of Similarities between "Meet the Parents" and "The Tenant" and/or "The Dysfunctionals"

Meet the Parents	**The Tenant and/or The Dysfunctionals**
The story starts in Chicago but takes place in New York	The story takes place in New York **Def Exhibit G - Txu-775-750** **Page 1 – 1st sentence**
Train	Train Scene **Def Exhibit H – Pau-2-283-460** **Page 3 - 1st paragraph –1st sentence.**
Hospital Scene – Man with IV	Hospital Scene -Woman with IV **Def Exhibit J - PAU- 2-423-720** **Page 52 - 6th paragraph**
Gregg practicing at the hospital to a patient on how he is going to propose to his fiancée.	Jo Jo, now fourteen, nervously looks forward. His eyes are wide, as he combs his hair. Jo Jo – Pam, w-w-will you go out with me? Suddenly, there is a

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	pounding at the door. Jo Jo has been standing before the bathroom mirror. **Def Exhibit J Pau-2-423=720** **Page 13 – Top**
School Scene Gregg on his knees practicing to ask Pam to marry him, however he finds out he needs her Father's approval.	School Scene Jo Jo – Jo Jo ask Pam out. **Def Exhibit J – Pau-2-423-720** **Page 14**
Gregg's Full Luggage Bag is lost.	Stimmy's Full luggage bag A moving truck drives by. Once it has passed, we can see Stymie struggling from his car toward Vinny's house with an over-packed suitcase. **Def Exhibit J – Pau-2-423-720** **Page 78 - 2nd.** **Narration from the bottom.**
Dina Byrnes – The	Jo Jo (During Jo Jo' high

Meet the Parents	The Tenant and/or The Dysfunctionals
attitude is confirmed by Pam's mother when she states to Jack Byrnes "No one was ever good enough for your daughter.	school years he was attracted to a girl named Pam in his history class. Pam would notice Jo Jo smiling at her from time to time but any chance for a true romance was zilch being that being that Pam came from the affluent side of town. **Exhibit H – PAU – 2-283-460** **Page 12 - 1st paragraph - through to 14)** Jo Jo (At this point had mixed feelings. Jo Jo kissed Pam back thinking to himself this would be his only kiss). Pam knew her parents were against any kind of relationship with this lad. Jo Jo (Cared about Pam but didn't want to delve into a complicated relationship or head

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	game. At the end of the movie Jo Jo kissed Pam goodnight.) I'll guess will meet sometime in the future. This was the last time they saw one another for a while. **Pam – Maybe we will.** **(Both teenagers were too young to comprehend the reality of the situation and with the threat of rejection, stalemated a relationship).** **<u>Exhibit H - PAU- 2-283-460</u>** **Page 14 – 1st five Characters including narration.**
Gregg pulls up to the house the father is manning the window and moves the curtain with a cynical and apprehensive attitude – The mood: and music is very Cynical –	Stimmy (Pulls up to the house thinking he's punctual. The landlord (Vinny) is viewing the potential tenant through a broken blind. Stimmy walked up to the front door and rang the bell about 4 times. Stimmy

Meet the Parents	The Tenant and/or The Dysfunctionals
	notices from a distance a dilated pupil peaking through the blind **watching his every move.** This type of behavior seemed quite peculiar even to Stimmy, the potential tenant. Stimmy happen to have his cellular phone handy and called Vinny, to see why he wouldn't answer the door.) Vinny are you there? Please pick up its Stimmy, the new tenant. Vinny (Picked up as Stimmy was leaving his message.) Hello, Stimmy its Vinny what took you so long? You're late. Stimmy (Looked quickly at the broken blind and noticed that the dilated pupil disappeared) Vinny - I thought I was on time, it's only 4'O'clock/

Meet the Parents	The Tenant and/or The Dysfunctionals
	Vinny - Maybe on your fucking watch, mine says 4:30 Stimmy (Didn't want to argue over the 30 minutes because he was in dire need of an apartment. However, Stimmy now knew that Vinny's clock was set a half an hour ahead of eastern standard time. Sorry, Vinny it won't happen again, traffic was unbelievable. Are you going to let me in? (Stimmy hears a dial tone). Vinny – What took you so long? Come on in Stimmy. Vinny - After 4 o'clock I decided to take a shower. I didn't hear the bell ring if that's okay with you. Stimmy noticed Vinny's hair was dry that Vinny didn't really take a shower. **Def Exh. H –PAu-283-**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	460 **Page 88 Paragraphs 1-8**
Roof Scene Analogy **Focker climbed up on the roof in an attempt to pursue the cat (Jinx) while up there he decided to have a smoke.** Jinx vanished into thin air. Of course Focker has to **eavesdrop** on a Jack Byrnes's conversation	**Roof Scene Analogy** Roof Scene - Jimmy climbed up from the 2nd story window to the **rooftop** like a monkey, in an attempt to pursue a nosey neighbor. **Defendant's Exhibit H - PAU-2-283-460** **Page 24 - 2nd paragraph last sentence.** The neighbor took off like a scared cat and **vanished into thin air**). You Mother fucker! **Exhibit H PAU- 2 – 283-460** **Page 24 – Next to last paragraph last sentence.** The tenant picks up the

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	extension and **eavesdrops** on the landlord's conversation. **Def Exhibit H PAU- 2-283-460** **Page 125 . 7th Character narration.**
Focker drops his cigarette and slips causing the leave to ignite in the gutter. He tries to put the fire out and kicks the gutter that somehow **frays two wires** off the house **sparking**.	Lie Detector Test – Stimmy found himself bound and gagged to a chair, now witnessing Vinny plugging in the extension cord into the electrical outlet. (frayed wires) Vinny started touching **two (frayed) wires** showing Stimmy the **sparks** **Defense Exhibit H – PAU- 2-283-460** **Page 97 - 3rd Character 1st and 2nd sentence.**
The sparks ignite on the leaves and we now have the **spreading like wildfire**.	Stimmy (Looks at Jo Jo who seemed sincere about keeping his secret, was now **spreading like**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	wildfire. covering the receiver). You told him right?
Focker after starting the fire from the roof had claimed to be in the **shower** however his **hair was dry**.	**Def Exhibit H PAU-2-283-460 Page 87 - 10th Character narration.**
	Stimmy (Noticed that Vinny's **hair was dry,** and if he was in the **shower**, who was looking out the window? Stimmy thought to himself that Vinny was a cartoon character,
Focker got a quick tour of the house	**Def Exhibit H – PAU-2-283-460 Page 88**
	Vinny (Gave Stimmy a **quick tour of the house.)**
Jack - The toilet is not flushing right in this bathroom.	**Def Exhibit H – PAU-2-283-460 Page 88 - 2nd to last Character**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Vinny - The **bathroom is in the process of renovations,** once they are completed, the rent will obviously go up a few dollars. You understand. **Def Exhibit H – Pau-2-283-460** **Page 89 - 1st Paragraph 3rd sentence.**
Jack Byrnes was a **Control Freak**	
	Vinny – Stimmy I made dinner reservations at an exclusive restaurant. We will discuss the lease at the restaurant. It will protect both our interest. (As Vinny referred to an item he had in a paper bag.) Please, I heard about your habits, try and be on your best behavior at this restaurant, because I'm a regular there.
Pam told Focker try not to be sarcastic	
	Stimmy began to

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Jack Burns to Focker What do you drive their a ford? Interesting color did you pick it? They say only Geniuses pick green but you didn't pick the color? (The ambivalence and animosity between the two becomes quite apparent which creates the rivalry.) Pam's future Father-In-Law ridicules Stimmy when he misses the turn in the Race home scene.	acknowledge that Vinny seem to be some sort of **Control Freak**, the way he carried himself, and ordered him around in such a demanding manner.) Vinny told Stimmy in an arrogant manner. Now get your fucking car. Stimmy (Looked at Vinny in shock for a second, not believing what he had just heard. Stimmy with a bit of **sarcasm** retorted.) What did you say? Vinny Then get you fucking car. Stimmy (Figured, Vinny was paying for the meal, so he had to drive.) Okay. Vinny - (Upon entering

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C–Meet the Parents (DVD).	Stimmy's car, complained about everything for instance) **Why did you buy a standard shift?** How about if I need to borrow your car? (The entire ride to the restaurant, Vinny was **badgering Stimmy the potential tenant on his driving skills.) Where the fuck did you learn how to drive like that?** Stimmy would you please leave me alone. Vinny (Giving Stimmy turning directions, once he was already in the intersection screaming out to him, at the top of his lungs.) Make a right, a left now! (If Stimmy **missed the turn he wouldn't hear the end of it.)** **Def Exhibit H – PAU**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	2-283-460 **Page 89 - 11th Character.** Vinny- Yeah, what? **What kind of car do you drive?** Victims Husband - a station wagon. **Def Exhibit H – PAU-2 –283-460** **Page 99 - 5th & 6th Character from bottom.**
Elmer Fudd impersonation Scene Dina Byrnes – "Where is my "Widdle girl" Elmer Fudd **Def Exhibit C–Meet the Parents (DVD).**	**<u>Elmer Fudd impersonation Scenes.</u>** **<u>Def Exhibit H – Pau-2-283-460</u>** **Mid paragraph page 137**
Lost Luggage Scene at Airport – Focker gets spewed up on. Mother Brynes	Jo Jo spewed up. Passengers on the plane became repulsed from

Meet the Parents	**The Tenant and/or The Dysfunctionals**
complains of smell **Def Exhibit C-Meet the Parents (DVD)**	the smell of spew **Exhibit H – Pau-2-283-460** **Bottom of page 168**
Anything you need just ask me casa es su casa	Make yourself at home.
Unique last name Focker **(The name Focker is prevalent throughout both Meet the Parents and Meet the Fockers, the intent of the usage can only be construed as referring to Fucker again referring to an individual).** **Def Exhibit C–Meet the Parents (DVD)**	"Fucker" is prevalent throughout all the plaintiff's copyrights it refers to an individual in a comical aspect. **Def Exhibit H – PAU-2 –283-460** **Pages 50, 118,160,168,169,232 etc, etc, etc.,** The content of the material used in expressing this story may be a bit distasteful and offensive the author expresses his deepest apologies to you the reader. The reason for the decadent vocabulary use is incumbent to receive the kind of attention and

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	recognition the author climaxes on. The inclination of such a reaction is to pursue the comical aspect of this novel to its fullest extent. **Def Exhibit G – Txu-775-750** **Page 5 – 1st Paragraph**
Jack Brynes gets a call and tells the travel agent to disguise his voice with a southern accent, **Def Exhibit C–Meet the Parents (DVD)**	Vinny is leaving a message on Stimmy's answering machine, in a disguised voice. **Def Exhibit H – PAU-2-283-460** **Page 100 - 3rd character 1st sentence**
I wish you didn't tell you parents I hate cats, but you do hate cats	Stimmy began reading the grounds for divorce, as his buddies were sneaking a peak, finding out that Stimmy had some really bad habits. These chaps weren't aware of Stimmy's habits that were now exposed and led to an embarrassing situation. When Stimmy noticed

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit D–Meet the Parents (DVD). Focker claimed it was a nightmare. **Def Exhibit C-Meet the Parents-(DVD).**	**that his buddies were sneaking a peak he asked them to keep certain stipulations confidential, both buddies were sworn to secrecy.** **<u>Exhibit G - TXU- 775-750</u>** **Page 57 Last Paragraph.** Jo Jo explained to Stimmy that his brother Vinny was looking for a roommate and that he would give him a call, he promised Stimmy he could hook him up. Stimmy had no idea that his real **nightmare** was about to begin. **Exhibit G – TXU – 775-750** **Page 58 1st Three sentences.** Jo Jo told Stimmy that he and his brother needed some **privacy.**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Stimmy could see from the table Jo Jo laughing hysterically, like a nut whispering to Vinny. Stimmy went over to the phone to say hello to Vinny the brother handed the phone over to Stimmy. The landlord was telling Stimmy that his last tenant had some "Bad Habits" and left the premises in an ambulance, pretty much fucked up. Vinny explained how he had rules and regulations that had to be abided by and would not tolerate "bad habits" do you know what I mean? Stimmy looked at the brother who seemed sincere about his secret that was beginning to spread like wildfire. **Def Exhibit G TXU-775-750** **1st Paragraph**
Jack Byrnes – Not many men in your field	The brother Vinny told the tenant that he'd fix

Meet the Parents	The Tenant and/or The Dysfunctionals
(This is how the whole Nurse character developed for Meet the Parents and Meet the Fockers including the constant insinuations and ridiculing that Focker may be gay. **Def Exhibit C-Meet the Parents (DVD)**	him up on a hot date and the she was on her way. The landlord explained to the tenant that she was a **nurse** that he met at his brother's psychiatric ward. Vinny told Stimmy to take a quick shower and get ready. After the shower Stimmy went into the downstairs bathroom to shave. Stimmy heard a loud thump outside of the house. The bell rang Stimmy peaked out the window and saw a woman in a nurses uniform, with a big head looking a bit strange as she was downing a bottle of beer. Stimmy opened the door and to his surprise the peculiar looking woman resembled the landlord. When in fact the tenant finally realized it was the landlord with a wig on dressed up like a bitch he let out a sigh of disgust.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Def Exhibit G – TXU- – 775-750 **Page 123 - 1st Paragraph.**
Jack Brynes – Is your loved one, safe with a stranger? Can you really trust another human being? Yes or no? Focker answers yes! Jack Brynes – Wrong the answer is no! **Def Exhibit C-Meet the Parents (DVD).**	The content of this book will help you develop a sense of **cynicism** prior to becoming a statistic yourself by a dysfunctional, if given the chance could possibly turn your life into shambles. **Def Exhibit G – TXU-775-750** **Page 4 – 4th sentence. .**
Jack Byrnes - Trust me Gregg when you have "**Little Fockers**" running around your gonna' need protection. (Focker is used in these	**"Little Fuckers"** **Defendants' Exhibit H – Pau-2-283-460** **Page 110 - 1st Paragraph next to last sentence.** **Jimmy (To make sure the ordinances are**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
two projects entitled Meet the Parents and Meet the Focker in a comical aspect refers to individuals Fuckers). **Def Exhibit C-Meet the Parents (DVD).**	**enforced, Jimmy walks through the railroad rooms with a flashlight, shining the light in the little fuckers (children) eyes, to see who's in defiance of the sleeping code.)** **Def H – Pau – 2-283-460** **Page 10 Last paragraph narration.**
Jack - You like Peter Paul and Mary [Puff the magic dragon. Great song Focker -Who really would have thought it wasn't about a dragon, Jack - What do you mean ? Fccker -You know the whole drug scene. To puff the magic dragon	Dilated Pupil – peaking through the blinds (Dilated pupil would refer to high status a pot head).

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Jack –Puff is just the name of the boys magic dragon Focker are you a pot head ? Focker – I tried it but Jack – Yes or No Focker ? **Def Exhibit C- Meet the Parents (DVD).**	**Def Exhibit H – Pau-2-283-460** **Page 88 2nd Sentence.**
Jack Brynes - Hospital worker looking for access to ludes. We already know he puffs the magic dragon. **Def Exhibit C-Meet the Parents (DVD).**	Crack and Overdose **Def Exhibit G TXU-775-750** **2nd, sentence – Page 91**
Worker dragging behind him some dismembered limbs **Def Exhibit C-Meet the Parents (DVD).** _____ **"Cheap Bottle of Champagne Scene"**	Dragging behind him some dismembered limbs **Def Exhibit – I – PAU-2-380-629** **Page 14 – 4th Paragraph – 2nd sentence** _____ **"Cheap bottle of**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Focker wanted to purchase an expensive bottle of champagne – However they only have Mums instead of an expensive champagne. La Heim !	**champagne Scene"** A very hyper man breaks out the bottle of champagne, camouflaging the label with a pink cloth. After the pouring they raise their champagne glasses preparing for the holiday toast with puzzled faces, as the stock toast is delivered by Jimmy. Let's hope this holiday doesn't wind up like last year! Salute !
Focker makes grotesque faces at the urn and camera at the end.	**Defendants Exhibit H – Pau-2-283-460 Page 15 = 5th Character.**
Def Exhibit C- Meet the Parents (DVD).	Jimmy , looks through the window, is making grotesque faces stretching his face with his hands. The nurse holds up his child, and the facial activities stop.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Def Exhibit G. TXU 775-750 **Page 14 - Last paragraph, last sentence.**
Focker spying on Jack picks up a magazine and opens it and Jack sees a picture of a woman and breast pumps. Focker claimed to have been brought up on a farm. Jack brings up a cat named Cheppetto (Puppet). Bestiality Joke Gregg explains why he was looking at the magazine with breast pumps and elaborates on how he was brought up in Detroit Michigan but it wasn't a farm per se // Gregg explains that he had a litter of cats and one cat couldn't make it to the mothers teethe and he went in and just milked into a little saucer. nipple so he	Husband (Sees her about to enter the closet) Oh! Stay out of the fucking closet or you'll be joining my puppets! **Def Exhibit H - PAU 2 –283-460** **Page 51 - 9th Character.** **Bestiality Joke** I would now like to give you an example of the love Jimmy had for his neighbors. Jimmy was busy doing some carpentry work on his second floor apartment. A sticky beak neighbor wanting to engage in a friendly chat initiates the following

Meet the Parents	The Tenant and/or The Dysfunctionals
milked the nipples Mrs Brynes - I had no idea you could milk a cat Gregg you can milk anything with nipples Jack states: "Focker I have nipples could you milk me too. Deleted Scenes/ Jack - Maybe Gregg does it to the cats like people do it to the sheep. **Def Exhibit C- Meet the Parents (DVD).**	conversation. Neighbor (Notices Jimmy working diligently.) Hello, Jimmy what are you doing up there ? Jimmy (The neighbor could see Jimmy's head bobbing up and down in the window. No reply was given to the neighbor . However, Jimmy began swinging the hammer more fiercely, trying to give the neighbor a hint as to "fuck off") Neighbor tried a second time to initiate some sort of conversation as to what Jimmy was doing up there? Jimmy (Wiped the sweat from his brow and replied to the noisy neighbor in a boisterous tone.) Hey, scum bag ! I'm fucking a chicken up

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	here, would you like to come up and hold his head down!! **Def Exhibit Pau 2-283-460** **Page 23 – 2nd paragraph down**
Jack Burns was always time conscious. **Def Exhibit C- Meet the Parents (DVD)**	Time Conscience. (The landlord would have to be at work a 7 a.m. in the morning, but due to his tardy phobia he ritually awoke every morning at 3:45 a.m. **Def Exhibit H – Pau-283-460** **Page 98 - 2nd paragraph 1st Sentence.** Vinny told Stimmy he did not like being tardy. **Def Exhibit – G - TXU-775-750** **Page 62 Last Par. 2nd & 3rd, sentence.**
Dina – Gregg never had a home cooked meal. They were always	The kids rush over to the pizza, and begin fighting for their slices.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
fighting in the kitchen over containers of Chinese food. **Def Exhibit C- Meet the Parents (DVD)**	**Def Exhibit J – Pau-2-423-720** **Page 24 - 1st Paragraph.**
Jack Brynes wife Dina's Character very permissive and easy going the rational one. **Def Exhibit C-Meet the Parents (DVD).**	(Jimmy's wife's Character very permissive and easy going the rational one). I'll get your dinner ready honey, it's going to take a couple of minutes to heat up. **Exhibit H – Pau 2-283-460** **Page 3 8th, Character last sentence.**
Focker is wearing Pams bathrobe. Jack what's with the rob? Don't worry about what happen today. Lets put all that behind us and enjoy our weekend together. **Def Exhibit C-Meet**	Carlo pulls up to the house and honks his horn. He gets out of the car. The front door to the house opens and Carlo' Father wanders out in a woman's bathrobe. **Def Exhibit I PAU 2-380-629** **Page 53 3rd,**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
the Parents (DVD).	**paragraph from the top.**
One more thing under our roof it my way or the long Island expressway keep your snake in its cage /// **Def Exhibit C-Meet the Parents (DVD).**	Vinny - Rules and regulations of the house I'll tell you what I'm talking about homo, there are rules and regulations that have to be abided by and I will not tolerate "bad habits" you understand me! **Def Exhibit H - Pau 2 – 283-460** **Page 87 - 9th,** **Character.**
Jack Burns - Just something about him that's a little off! Greggs Eaves dropping on Pam's parents. Gregg's Eavesdropping **Def Exhibit C-Meet the Parents (DVD)**	Stimmy's Eavesdropping Listening to the conversation between the brothers and began to choke. **Def Exhibit H - Pau 2-283-460** **Page 126 4th** **Character – narration**
I just realized something "Pamela Martha Focker"	Mother Fucker – You mother fucker you've been giving me trouble since you came into my

Meet the Parents	**The Tenant and/or The Dysfunctionals**
(Martha Fucker in these 2 entitled projects Meet the Parents and Meet the Fockers is intended to mean in a comical aspect Mother Fucker) **Def Exhibit C-Meet the Parents (DVD)**	house. **Defendant's Exhibit H PAU-2-283-460 Pages 17 2nd character 2nd sentence from the end. Additional.Pages:/23/24/29/30/37/47/48/54 /99/102/1/ 111/117/129/132/135/157/165/179/189 224/231/235** Martha – The name is a character in the tenant. **Def Exhibit H – PAU-2-283-460 Page 143 Top of page 1st character.** The content of the material used in expressing this story may be a bit distasteful and offensive the author expresses his deepest apologies to you the reader. The reason for the decadent vocabulary use is incumbent to

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	receive the kind of attention and recognition the author climaxes on. The inclination of such a reaction is to pursue the **comical aspect** of this novel to its fullest extent. **Def Exhibit G – Txu-775-750** **Page 5 – 1st Paragarph.**
	CIA Character Scene. Mistress – What happen?. Jo Jo – What do you think happen? (Jo Jo first looks cautiously peels out, going through a steady

Meet the Parents	The Tenant and/or The Dysfunctionals
	red. Mistress – You mean to tell me, they just let you go, without arresting or ticketing you? Jo Jo – flicks his wallet at her, than puts it away. Give me a break don't you know who I am?
Picture of Jack Brynes with President Clinton.	Mistress – I have no idea, who you are! Jo Jo – I'm fuckin CIA baby! That's who the fuck I' am. I'll have both those fucking cops sucking dick on the beat for the next ten years! (Jo Jo grabs a cellular phone from his glove compartment, dials a number. The mistress realizes that a few wires are protruding from the phone, and the back panel is missing).
Picture of Jack Brynes with a turban on in Arab	Jo Jo – Hello, Bill ?

Meet the Parents	**The Tenant and/or The Dysfunctionals**
disguise, referring to some sort of covert operation. Picture of Jack Brynes with a General. **Def Exh C-(MTF).**	What's going on? You don't say, cock sucker! I'll jump on the first plane to Washington, and we'll discuss the **invasion** over dinner in the oval office! The mistress notices Jo Jo watching her from the corner of his eye. Mistress – Who are you speaking to? Jo Jo – Excuse me! Excuse me! (Clears his throat and covers the phone) You have no idea who the fucking president of the United States is? Mistress (Scared Shitless) You talking to the President of the United States? Wow how impressive! Jo Jo – That's right! The president of the United Fucking States (screaming)

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Slick Willie, that's right! Slick Fucking Willy, leave the invasion up to me! I'll push the fucking button don't worry. I'll push the button. I know you need a skate goat! The CIA Scenes are inclusive in all the scripts. // **Exhibit J – Pau 2-423-720** **Mid paragraph on Page 39 and page 40.** **<u>Also in Exhibit H</u>**
Focker wakes up in the morning and Jack is right next to him in a chair – You have to keep this a secret if you know	CIA Scene Regular – So what do you do for a living ? Jo Jo – (Jo Jo doesn't make eye contact with the regular). I don't want to talk about it. Regular – Come on your could tell me. Jo Jo – Hey what the

Meet the Parents	**The Tenant and/or The Dysfunctionals**
what's good for you **Def Exhibit C- Meet the Parents (DVD).**	fuck are you writing a book ! Fucking CIA pal, now **keep your mouth shut, if you know what's good for you.** **Exhibit H – Pau 2- 284-360** **Page 134 - 6th – 9th, Characters.**
Gregg Fell into a secret door Looking for something Gregg I heard a noise and came down to see if everything was okay.	A door opened and Vinny comes flying down the stairwell. Def Exhibit H – Pau-2-284-360 Stimmy (Stimmy believed he had the landlords undivided attention. As if he were really interested in what Stimmy had to say. However in the midst of said conversation the landlord passed out snoring. While Vinny was in a state of REM on the couch. Stimmy in trying to give the landlord the benefit of the doubt, began looking for clues of a second

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD)	individual in the house to vindicate the landlord. He anxiously walked up the stairwell to investigate his alleged suspicion, upon conclusion the reality of said situation had been confirmed. That Vinny was one sick puppy. **Def Exhibit H- Pau 2-284-360** **Page 95 - Last - 2 characters.**
Jack Byrnes - Antique polygraph machine try that on – straps Gregg to the machine and begins to ask a series of questions / See if he is telling the truth.	**Old Fashion Lie** Detector Test is in all scripts and novels.- (Vinny thought Stimmy was a trespasser). Stimmy - When Stimmy regained consciousness, he found himself bound to a chair, now witnessing Vinny plugging in an extension cord, into an electrical outlet. Vinny began touching the two wires, showing Stimmy the sparks. Stimmy was dazed not able to

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	comprehend the full extent of Vinny's show and tell. Until Vinny began flicking the wires on him). Ahhhhhh Ahhhh! Stop, stop, I'm your tenant the lease is on the table! **Exhibit H- Pau-2-283-460** **Page 97 3rd Paragraph.**
Jack Brynes -Have you ever watched pornographic videos ? No the needles are jumping / **Def Exhibit C-Meet the Parents (DVD)**	Real Estate Agent and Potential Buyers. (The trio looked down the stairwell through the mirrors reflection and saw the landlord stretch out on the catch bare ass watching a Chinese **Porno Flick** **Def Exhibit H – Pau – 2-284-360** **Page 53 1st Paragraph.**
Gregg is traumatized sitting up in the corner of his bed //after taking the lie detector test and telling Pam what he's been through.	Stimmy is traumatized - What reasoning convinced you to electrocute me with the wire? .

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	**Def Exhibit J – Pau-2-423-720 Page 97 - 5th. Character last sentence.**
Jack Brynes jimmied the locks open on Focker's luggage. **Def Exhibit C-Meet the Parents (DVD)** Luggage comes Jack Brynes goes through Jack Brynes went through Gregg luggage and found a dildo Pair of black panties and a whip. This led Jack to believe that Gregg was some sort of a sexual deviant. **Def Exhibit C-Meet the Parents (DVD)**	Stimmy- heard his door being jimmied as Vinny gained access to his room. **Def Exhibit H – Pau – 2 – 283-460 Page 137 – 2nd par. 1st and 2nd sentence.** On one occasion he thought he saw the landlord (Vinny) ransacking his belongings). Hey, what are you doing in my personal belongings. **Def Exhibit H – Pau-2-283-460 Page 97 Stimmy 7th paragraph 2 last sentences.** Sex Paraphernalia – dildo masochistic black mask

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Def Exhibit F - TXU-742-462 **Page 92 – 3rd paragraph 3rd sentence.**
Gregg is wakes and is startled as he sees Jack Brynes right next to him. **Def Exhibit C-Meet the Parents (DVD).**	One night the tenant was having nightmares and awoke in a semi-conscious state, he looked over to where the chair was planted and saw the landlord sitting in the chair starring at him. **Def Exhibit G TXU – 775-750** **Page 72 - Last paragraph – 3rd, sentence.**
Gregg came down for breakfast and met the in-laws – Some got a visit from the hair fairy. **Def Exhibit C-Meet the Parents (DVD).**	Hair is straight up in the air. **Exhibit H PAU-2-283460** **Page 96 – 7th Character 4th sentence**
No one laughs at his jokes he felt alienated.	When the chaps realized that the women were not laughing at their jokes,

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Pay a little visit to the shower fairy. **Def Exhibit C-Meet the Parents (DVD).**	they began to feel alienated and figured that maybe the women were not accustomed to the kind of sick humor they had been accustomed to their entire lives . **Exhibit H - PAU2-283-460** **Page 75 - 8th character (narration) 1st sentence.**
Go Away Mat-Denny's room. **Def Exhibit C-Meet the Parents (DVD)**	Leave me alone. **Exhibit G - TXU-775-750** **Page 72 - 4th sentence.**
Denny – Hey! Hey! What are you doing in my drawers? **Def Exhibit C-Meet the Parents (DVD).**	By the way Oliver Twist stay out of my drawers, remember before you people leave you are subject to search and seizure. **Def Exhibit H** **PAU-2-283-460** **Page 52 - 8th,**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Where you just sniffing my boxers dude? **Def Exhibit C-Meet the Parents (DVD).**	**Character.** The mute was found in the couple's bedroom, the draws had been ransacked and he was found sound asleep in the couples bed with the wife's panties over his head. **Def Exhibit G - Txu 775-750** **Page 163 – Last Sentence**
Gregg I was petrified of your dad when you told me he was a retired florist. **Def Exhibit C-Meet the Parents (DVD).**	The tenant is confiding in a friend about his living conditions on how he's afraid of the landlord. **Def Exhibit H PAU-2-283-460** **Page 132 3rd, Character last sentence.**
Focker called it a nightmare!	Nightmare – Stimmy had no idea that his nightmare was about to begin.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	**Def Exhibit F – TXU-742-462** **Page 32 – 6th – Paragraph**
Circle of Trust **Def Exhibit C-Meet the Parents (DVD)** Jack Brynes lets Focker back into the circle.	We will now take into consideration that Old cliché "Birds of a feather flock together" History plays an important role here, just as a war brings a country together in a time of crisis. The characters portrayed in this novel show a sick sense of allegiance towards one another, due to the experiences growing up in such a demented environment. This fidelity creates a bond forming these chaps into a crew. **Exhibit G TXU -775-750** **Page 8 Last Paragraph** The tenant after two

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	weeks had past was without incident the brother and landlord finally apologized for there outrageous behavior, which relieved the tenant greatly. The landlord explained to the tenant that the behavior perpetrated on him was sought of an initiation to the family. However, the brothers were still looking for the burglars who robbed the tenant that night. **Def Exhibit F - TXU-742-462** **Page 71 – 2nd Paragraph**
Jack Brynes - Activate the alarm t-minus 15 seconds I don't want to be late //////// going to be late ---	The landlord had also had a tardy phobia that he was going to be late for work his job didn't start until 7a.m. in the morning but he had to be the first on the sight.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	**Defendant's Exhibit G – Txu – 775-750 Page 92 - 2nd, paragraph last sentence**
Jack Byrnes I will be **watching your every move** studying your every move and if I find that you are trying to corrupt my first born child I will bring you down to China Town!	Stimmy notices from a distance a dilated pupil peaking through the blind **"watching his every move".** (This type of behavior seemed quite peculiar even to Stimmy, the potential tenant. **Def Exhibit H Pau 2-283-460 Page 88 1st Paragraph 4th and 5th sentence.** **Vinny - Hey, Stimmy I just got rid of my wife, I really don't need anybody** watching my every move. **Def Exhibit H – Pau 2-283-460 Page 125 – 7th Character 1st Sentence** When he entered the

Meet the Parents	The Tenant and/or The Dysfunctionals
	visiting room the orderly's were instructed watch Vinny's every move. Def Exhibit G TXU-775-750 Page 101 3rd full par down 3rd sentence. The landlord watched the trio's reaction through the same reflection in which they were watching him.
Def Exhibit C-Meet the Parents (DVD).	Def Exhibit – G – TXU – 775-750 Page 35 – 3rd- Paragraph last sentence. Watched with binoculars Def Exhibit – G- Page 21 - 4th sentence Brother looking to quite his job, to

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	"Watch the Tenant" **Def Exhibit F - TXU-742-462** **Page 33 - Paragraph 2 – 2nd and 3rd sentence.**
Skimpy Bathing Suit Scene (Focker) **Def Exhibit C-Meet the Parents (DVD).**	The chaps beach attire and dinner attire where one in the same a skimpy bathing suit and from a right angle you could see his testicles hanging out. **Exhibit G TXU-775-750** **Page 136 – 2nd Paragraph – 3rd sentence.**
Volleyball Game Scene – hit in the nose. (Pam's Sister) **Def Exhibit C-Meet the Parents (DVD).**	Volleyball game Jo Jo just picked up a girl who just broke her nose playing volleyball. **Def Exhibit F TXU 742-462** **Page 95 – 3rd. Paragraph middle to end.**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Deleted Scene Crawl Space – Jack Brynes - Investigating Focker – Time is of the essence running Greggs name to Whether he's really is who he says he is.	I want him locked up, Stimmy as he entered the premise heard the landlord spelling out his name to some kind of telephone official on the phone.)
	Def Exhibit H - PAU-2-283-460 Page 129 - 1st Par. 3rd and 4th sentence.
Def Exhibit C-Meet the Parents (DVD).	Regulars (Being a bunch of cynical pessimist, set out to investigate Jo Jo in finding the truth. The finding would be concluded in a week, at the next coffee conference.
	Def Exhibit H - PAU 2-283-460 Page 134 - 3rd paragraph from the

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	bottom 1st, two sentences.
Jack Brynes - Honey this kid has been lying to us since we met him. **Def Exhibit C-Meet the Parents (DVD).**	After an intensive investigation it had been concluded, that the brother had nothing to do with any type of Law enforcement agency **Exhibit H –PAU – 2-283-460** **Page 134 - 3rd, paragraph from the bottom last two sentences.**
Jack Brynes - Honey this kid has been lying since we met him /// **Def Exhibit C-Meet the Parents (DVD)**	Jimmy Don't listen to that piece of shit, he's been giving me trouble since he came into the family. **Def Exhibit – H - Pau 2- 283-460** **Page 19 – 11th, Character** Vinny That guy (Stimmy) is nothing but trouble, I caught him eavesdropping on my conversation.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	Pau 2-283-460 **Page 128 - 6th Character**
Kevin - A carpenter as a hobby put Bolivian warm wood floors in and had wood from different countries. **Def Exhibit C-Meet the Parents (DVD).**	Vinny – The defendant told the plaintiff that he would specially order cabinets from Vienna – The defendant kept looking away as he was estimating the prices as if he wasn't quite sure on what to charge. However, the defendant assured the plaintiff that he was highly qualified and the Michael Angelo of Carpentry. **Def Exhibit G - TXU-775-750** **Page 153 – 3rd paragraph 4th, sentence.**
Jack Brynes speaks Asian dialect	Vinny (As they began walking up the stairwell, Vinny noticed that the potential buyers were of Asian descent. Vinny standing in a karate stance throwing kicks and punches began

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	talking Chinese fluently to the potential buyers. **Def Exhibit H – PAU – 2-283-460** **Page 52 – 4th Character**
Gregg looking for Jinx in the car says "Fucker". **Def Exhibit C-Meet the Parents (DVD).**	Fucker **Def Exhibit G TXU – 775-750** **Pages 11/14/24/27/32/80/102/127/ 140/ etc.** **Def Exhibit – PAU-2-283-460** **Pages 50/118/128/129/160**
Driving Eratically Pulls up Parallel at the light focker you're a wild man at the wheel . Jack pulls up Parallel Focker what's the matter with youupi were si[[pse tp ,ale tjat ;eft at the light focker // I wonder if he has a license you're a lunatic	Race Home – Pulls up parallel

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Jack talk Thai – dad is not retired Terrified of you // I think you have some serious issues///	
Jack Brynes – While calling from a payphone from the restaurant received a message from a concerned neighbor in relations to his cat Jinx. **Def Exhibit C-Meet the Parents (DVD).**	The plaintiff within minutes of finding his house in total disarray received a phone call from a concerned neighbor. The neighbor asked why the police and the ASPCA were over his house. The plaintiff was in shock to hear such an accusation. **Def Exhibit G - TXU-775-750** **Page 156 Paragraph 3 – 2nd sentence to the end.**
Jack Byrnes threatens Gregg at the Tuxedo Shop thinking that Gregg is a bad influence and is going to corrupt his daughter.	Stimmy's Father-In-Law – Threatens Stimmy. If you fuck with my

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	daughter I will give you a smile like a clown.
I will bring you down to China Town – I'll be watching you!	
	Def Exh H-PAu-2-283-460 **Page 85 – 9th Character.**
Def Exh C (MTP))	
	When the plaintiff entered his apartment it seemed as though an earthquake had hit the premises. //
Jack Brynes retrieved his messages from a pay phone and a **concerned neighbor** called claiming to have found his cat Jinx without his collar.	The plaintiff within minutes of finding his house in total disarray received **a phone call from a concerned neighbor** who lived beneath him.
Animal Shelter Gets the cat from the animal shelter Focker Spray paints the cats tail so the cat would look like Jinx. When they returned home from the restaurant the house was in total disarray.	**Def Exhibit G TXU-775-750** **Page 156 Paragraph 2**

Meet the Parents	**The Tenant and/or The Dysfunctionals**
	- 5th, sentence and Paragraph 2nd 3rd and 4th sentence. .
Their belongings were **shredded** across the room in a **bizarre manner.**	Stymie pulls up by Vinny's house . His belongings are burnt and **shredded** across the front law.
	Def Exhibit J - PAU 2-423-720 Page 133 – Last Par. 1st & 2nd sentence.
Bizarre manner.	Stimmy drove home. As he pulled up to the front of the house, he saw all his personal belongings
Def Exhibit C-Meet the Parents (DVD).	thrown all over the street in a **bizarre manner.)**
	Exhibit H - PAU- 2-283-460 Page 232 – last paragraph 5th & 6th sentence.
Jack Brynes jimmies open Gregg's luggage that has arrived. The	Stimmy that morning heard his door being jimmied- when the door

Meet the Parents	**The Tenant and/or The Dysfunctionals**
content sexual (Dildo, Whip, Black Panties.) Referring to Gregg as an S&M Masochistic – Sexual Deviant. **Def Exhibit C-Meet the Parents. (DVD).** Focker Drives ---stops at light // race home stops at the light // Jack pulls up parallel eye contact// Jack pulls up paralled// Jack pulls up parallel eye contact // I'm watching you -- // Jack just turned you were suppose to make the left at the turn Focker ////	opened-cleaned out Stimmy's wallet. **Def Exhibit H – PAU-2-283-460** **Page 137 – 2nd & 3rd sentence.** Ridiculing a sexual deviant Witnesses giving statements: **Def Exhibit F – txu-742-462** **Page 92 - 1st 2nd and 3rd sentences.** Race Home – The incident that led to the straw that broke the camels back, was when Vinny was caught by his wife, Thelma **pulled up parallel** up to a traffic light she look over and saw a man that resembled her husband with a woman in the car. The couple were sexually molesting one another in

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Pulls up parallel exactly 3 (three) times. **Def Exhibit C-Meet the Parents (DVD).**	broad daylight. So Thelma decided to **pull up parallel** again at the next traffic light to get a better view. To Thelma's surprise the man driving the car was her husband who should have been at work. Thelma couldn't believe her eyes so she **pulled up parallel** this time she began beeping her horn continuously to get her husbands attention When he made eye contact he realized that the bitch beeping the horn was his wife. **Pulls up parallel exactly 3 (three)times.** **Def Exhibit G - TXU-775-750** **Page 26 - 2nd,** **Paragraph – 2nd sentence to the end.**
Jack Brynes - Screaming – you spray painted his	After the drop off the husband immediately

Meet the Parents	**The Tenant and/or The Dysfunctionals**
tail to make him look like jinx – tried to beat us back so he could get rid of the evidence. **Def Exhibit C-Meet the Parents (DVD).**	proceeded home in an effort to substantiate an alibi. **Exhibit F TXU-742-462** **Page 15 – Last paragraph last sentence.**
How could you do something like that you set the alter on fire // I had a smoke he put so much lacquer, "**Frayed Wire with sparks set the fire**". **Def Exhibit C-Meet the Parents – (DVD).**	The **Frayed Wire Sparks** from the LIE detector test caused the fire. Began touching the two wires showing Stimmy the sparks. **Exhibit G - is part of this writers** **Page 97 – Paragraph 2 – 2nd sentence.**
Gregg's cat destroyed the inside of the house and the bridal dress and tuxedo's are **shredded** all over the room in a **bizarre manner/**	Receptionist – (Stimmy) You have been evicted and your shit is in the street. Stimmy pulls up to Vinnys house his belongings were burnt and **shredded** all over the front lawn.

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Get out of my house Focker and take the cat with you. **Def Exhibit C-Meet the Parents (DVD).**	**Def Exhibit J PAu 2-423 -720** **Page 133 - Last Par. – 1st and 2nd sentence.** The Eviction (Stimmy drove home as he pulled up to the front of the house, saw all of his belongings thrown all over the street in a **bizarre manner).** **Def Exhibit - PAU-2283-460** **Page 232 Last 2 Characters**
Dina Brynes - Jack can't talk Thai!	Husband (Screams out) You didn't know I could speak Chinese ha !! Well I happen to speak seven different languages .By the way Oliver Twist stay out of my drawers, remember before you people leave you are

Meet the Parents	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	subject to search and seizure. **Exhibit H - PAU-2-283-460** **Page 52 3rd Character from the bottom.**
Gregg - Your parents are breaking us apart. **Def Exhibit C-Meet the Parents (DVD).** Dina He still not good enough for Pam you never warmed up to Kevin until she warmed up to him /// maybe it's time you think about what she wants // **Def Exhibit C-Meet the Parents (DVD).**	Pam- Well, I would love to, but you know my parents would be against it. **Def Exhibit H – Pau-2-283-460** **Page 14 – 3rd Character** Jo Jo (Could not deal with a condescending attitude. So as an excursion Jo Jo evaded any future dates. Jo Jo knew to make the best of that night. Jo Jo intentionally distant himself from Pam, because of his inability to psychologically deal with rejection. Jo Jo grabbed Pam's hand and held it exclaiming !). I understand.

Meet the Parents	The Tenant and/or The Dysfunctionals
	Def Exhibit H - PAU – 2-283-460 Page 13 – Last 3 paragraphs.

Table of Similarities between "Meet the Fockers" and "The Tenant" and/or "The Dysfunctionals"

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Train Scene **Def Exhibit D-Meet the Fockers (DVD)**	Train Scene **Def Exhibit H- PAU-2-283-460** **Page 3 – 1st Paragraph -1st sentence.**
Ferry Scene **Def Exhibit C-Meet the Parents (DVD)**	Ferry to Fire Island **Def Exhibit H – PAU-2-283-460** **Page 78 -10th narration 1st sentence**
Hospital Scene Room Focker delivering a baby. **Def Exhibit D-Meet the Fockers (DVD).**	Hospital Emergency Room **Def Exhibit H- PAU-2-283-460** **Page 5 - 1st Paragraph - 1st sentence**
The family is frantically seeking a doctor to deliver their baby. Focker who's not a doctor is in the process of delivering the baby./ Family feels apprehensive due to Focker's medical qualifications and the fact that he's a nurse and	Jimmy (Pacing back and forth) Where is this fucking doctor ? Doctor Rosenberg – (Comes in and sees Jimmy pacing the floors by the operating room. Hello Jimmy, how are you doing?

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
not a doctor. However, the delivery goes well.	Husband – Fine, I guess today is the big day ha Doc? (In a whispered voice) Hey Doc, don't fuck this one up! Doctor Rosenberg – (Doctor heard what the husband had said but played as he didn't) What ? Are you talking to me ? Husband (In a boisterous tone as he was walking away). Listen, I heard about you mother fucker! **Def Exhibit H - PAU-2-283-460** **Page 5 2,3,4,5 and 6.** Listen my wife's having a baby! Don't gimme no problem – just get me a doctor now! Emergency Room – Night Jimmy comes running into the lobby with Rose in his arms, who is panting in agony.
Def Exhibit D–Meet the Fockers (DVD).	

Meet the Fockers	The Tenant and/or The Dysfunctionals
	Jimmy – Get me a doctor now! Nurse – What seems to be the problem? Jimmy what's it look like, a fucking square dance? My wife is about to give birth.! My wife is about to give birth ! Dr. Rosenberg winces upon seeing Jimmy. He quickly shakes his hand, and enters the delivery room. Dr. Rosenberg – Good evening , Mr. Mussino! He's gone before Jimmy can respond. Rose is screaming with pain as the Nurses set her up for delivery. Dr. Rosenberg enters. Good evening , Mres Mussino. How are you?

Meet the Fockers	The Tenant and/or The Dysfunctionals
	Rose responds with an agonizing scream. **<u>Def Exhibit –J - Pau 2-380-629</u>** **Page 7 Next to last Character** This particular page was not found in the defendant's Exhibit I // I will have to check all copies now. Family frantically looking for a doctor because his wife is about to give birth. When Jimmy finds the doctor he feels apprehensive due to doctor's medical mal-practices. However, the delivery goes well.
Jack Brynes sees Isabella's son and thinks its Gregg son. **Def Exhibit D – Meet**	That's not my baby doesn't even look like me. Whose is it? **Def Exhibit J PUA-2-423-720**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
the Fockers (DVD)	**Page 9 4th character**
Attorney Character Bernie Focker – Greggs Father. Meet the Fockers **Def Exhibit D- Meet the Fockers (DVD).**	Attorney Character – The Tenant and/or The Dysfunctionals. **Def Exhibit J – PAU – 2 –423-720** **Page 116 – 8th Character** **31 pages are missing in Pau-2-283-460** **a few other pages are missing in defendants exhibits.**
Gregg wakes up and finds a note attached to his chest drawn in magic marker. Gregg was sleeping between his parents and has come to the conclusion that Jack has paid him a visit while he was sleeping. **Def Exhibit D- Meet the Fockers (DVD).**	Stimmy wakes up and looks in the bathroom mirror and finds: Cat Whiskers drawn on his face- Stimmy has come to the conclusion that paid him a visit while he was sleeping. **Def Exhibit - TXU 775-750** **Page 73 1st paragraph**
Focker fleeing to the airport with the rock.	Stimmy wind up going to the vault, taking out the engagement ring that's been all over the neighborhood. Woman

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit D - Meet the Fockers (DVD).	was last scene fleeing to the airport with a rock on her finger. **Def Exhibit G - TXU-775-750** **Page 91 – Par. 1 – 3rd and 4th sentence**
Moses (Focker's Dog) humps everything in sight. **Def Exhibit D-Meet the Fockers (DVD).**	Starts walking down the peninsula, it's only a matter of time before they start going at it like two dogs in heat. **Def Exhibit H** **Page 132 – 2nd Character 1st Sentence.**
Bernie Focker claimed to have had one testicle. **Def Exhibit D - Meet the Fockers (DVD).**	One Ball **Def Exhibit F - TXU – 742-462** **Page 112 – 1st paragraph**
Cop Scene – Gregg and Bernie get pulled over for speeding and driving erratically	Vinny gets pulled over for speeding, blowing red lights and driving erratically.
Officer – Stay in the vehicle.	Police Officer - Pull over to the side of the road and keep your hands on the

Meet the Fockers	The Tenant and/or The Dysfunctionals
	steering wheel. Vinny pulled over quickly and jumped out of his vehicle running up towards the patrol car. Don't shoot! Police Officers (Already had their weapons drawn.) I told you to stay in the car and keep your hands on the steering wheel!
Bernie Focker – What's the problemo Officer?	Vinny – What's the problem? Police - We were going to ask you that? Let's see, speeding at 60 mph in a 30 mph zone, running steady red lights and driving recklessly. I'd sat that constitutes a major problem. Now get in the back seat of the patrol car and keep your fucking mouth shut.

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Def Exhibit H PAU 2-283-460 **Page 35 – 6-11 Character.** **Page 36- 1st paragraph.**
Gregg Focker fleeing custody trying to get Jack Brynes attention. A chase ensued and Gregg was taken down by a tazer gun.	Vinny fleeing custody. A chase ensued and Vinny was taken down by a tranquilizer gun, after a short scuffle. He is back in custody and sedated 10:4. **Def Exhibit H – Pau 2-483-260** **Page 227 - 5th Char. 4th and last sentence.**
Jack Brynes approaches the officer he flicks his identification and gives it	Police Officer – The way you were driving, you could of killed someone or caused a serious accident. (Vinny regaled to the officers, and a confirmation came over the PA) However, the next time we see you driving recklessly, your coming "downtown".

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
to the police officer– Jack Brynes CIA Officer responds - CI what ? Officer looks at Jack's identification says here you're a retired, what are you going to show me next your AARP card. Jack Brynes – Tells the officer to stand down or he'll be working security at a retirement home in Boyton Beach.	Vinny – took his wallet out of his pocket and flicked it open and close quickly, in an attempt to give his date the inclination that he was a man of influence. (CIA) Date- (And I'm the first Lady!) Listen, "Elliot Nest" you think you could drop me off. I don't want to be late for work. Vinny give me a break , you don't know who I am do you? Vinny I'm fucking CIA baby! That's who I am do you understand? I'll have both those cops walking the beat in the circus for the next ten years. **Def Exhibit H – PAU 2-283-460** **Page 36 Paragraphs 6 -10** **Page 37 Paragraphs 1-9**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Jack Brynes was then taken down by a "Stun Gun" and hit with a few volts.	**Stimmy was taken down by a stun gun and hit with a few volts.** **Def Exhibit H – PAU – 2-283-460** **Page 153 – 1st and next to last sentence.**
Check it out he's got a rubber booby. **Def Exhibit D Meet the Fockers (DVD) Deleted Scenes**	The police through a thorough investigation found semen on the seats and 3 rubber blow-up dolls in the back seat. The investigation proposed they were dealing with some sort of sexual deviant. **Def Exhibit H –PAU-2-283-460** **Page 120 - 1st Paragraph 3rd and 4th sentence.**
Officer - We in a hurry today? **What's the problemo**	Vinny - What's the problem officer ? Officer – We were going

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
officer? **Officer – The problemo is you were doing 55 mph in 45 mph zone**	to ask you that let's see speeding at 60 mph in a 30 mph zone – I'd say that constitutes a major problem. Now get in the back seat and keep your fucking mouth shut. **Def Exhibit H - PAU-2-283-460** **Page 35 – 10th, Character.**
Officer - Mr. Fucker – **Jay Roach Commentary – Jay Roach stated that the word Focker wasn't used enough.**	Fucker (Fucker – Focker for the purpose of Meet the Parents and Meet the Fockers – Fucker and Focker are one in the same this cannot be disputed.) **Def Exhibit H - PAU-2-283-460** **Pages – 50, 118,120,128,129,160,168, 169,232**
Officer - Jumps out of the	Vinny pulled over quickly

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
car remain in the vehicle you gotta a hearing problem!	and jumped out of his vehicle running up towards the patrol car in an attempt to avoid embarrassment and being ridiculed in front of his date. Officers don't shoot! **Def Exhibit H – PAU-2-283-460** **Page 35 – 9th Character.**
Officer- You want to dance with me, a little Do Se Do meaning "Square Dance". **Def Exhibit D-Meet the Fockers (D).**	What's this look like a fucking **square dance**? **Def Exhibit I PAU-2-380-629** **Page 7 1st Paragraph "Page Missing".** **Def Exhibit J – PAU-2-423-720** **Page 7 – 5th Character – 1st sentence.**
Poppa freak and baby freak out for a Sunday drive **Gregg is trying to explain to the officer**	**Freaks** – These freaks of nature were exposed, stereo-typed and labeled sexual deviants. **Def Exhibit H – PAU-2-**

Meet the Fockers	The Tenant and/or The Dysfunctionals
his mother is a doctor. Officer - Oh! Mrs. Freak Officer- Doctor of what ? Looks like you boys have been doing interstate porno trafficking granny style. Def Exhibit D-Meet the Fockers (DVD).	283-460 Page 176 – last Paragraph- last sentence. (Freaks – used in ridiculing sex maniacs). Judge –Bring the sex maniacs before the bench. (Freaks). Judge- I have no qualms on dismissing the charges against your clients, if those freaks go back to the United States. Def Exhibit H - Pau2-283-460 Page 184 - 8th, & 14th, Character
Oh my ginger bread Jesus!	Biblical reference Jesus Def Exhibit H – Pau-2-283-460 Page 127 6th Character
Looks to me like the kind	(Velvet Rope meaning

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
of videos you find behind the velvet rope. **Def Exhibit D-Meet the Fockers (DVD).**	**Red light district includes pornography etc).** Landlord 2 – By the way, you look familiar; do you hang around the peep parlors? **Def Exhibit H – Pau-2-283-460** **Page 238 – 9th,** **Character 2nd,** **sentence.** Jo Jo - you're a closet queer, right? Drive down to 20th street and 11th avenue the hooker hang out. (Gay Ridicule). Stimmy - Were going to go with hookers? Jo Jo - Unless you prefer men? (Gay Ridicule). Stimmy – Noticed he was in the **"Red Light District"** As Stimmy was about to pass a peep show

Meet the Fockers	The Tenant and/or The Dysfunctionals
	parlor, Jo Jo pushed him in). **Exhibit H – PAU-2283-460** **Page 158 -1st sentence**
Officer - Pan in which your gonna fry. The police officer had come to the conclusion that he was dealing with sexual deviants – low life scum. **Def Exh D –MTF)).**	Officer - He probably got what he deserved Had come to the conclusion that he was dealing with a sexual deviant low life scum. **Def Exh H – PAu-2-283-460** **Page 130 – 1st Paragraph – last sentence.**
Jack Brynes – To Child service Where are you taking my grandson? Child services called in because of evidence surrounding the case scenario. **Def Exhibit D-Meet the**	Author informs readers: If any type of warped behavior is being used as a form of conditioning or discipline in your household, stop right here and notify the child abuse hotline. (Child services – warped behavior). **Def Exhibit H – Pau-2-283-460**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Fockers (DVD)	**Page 10 – 8th, Character narration. – 4th sentence.**
Deleted Scenes Cop said do you want to Do Si Do (Square dance). **Def Exhibit D-Meet the Fockers (DVD).**	What's this look like a **square dance.** **Def Exhibit I PAU –2-380-629** **Page 7 - 4th Character 1st sentence.** [Page 7 is missing] What's this look like a square dance. **Def Exhibit J Pau 2 423-720** **Page 7 – 5th Character**
Sign Language Little Jack – When little Jack saw Isabelle's breast – he began moving his tongue and mimicking hand motions that were sexually explicit and undesirable.	Sign Language They made vulgar facial expressions, using their tongue and mimicking hand motions, which were sexually explicit and undesirable.

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
This sort of behavior is ridiculed in the Tenant and /or Dysfunctionals. However, the defendants' used a child to tone down the sexual content. **Def Exhibit H-Meet the Fockers (DVD).**	**Def Exhibit H PAU-2-283-460** **Page 134 – Next to last character –last sentence.** (Didn't catch on, to the message being conveyed). Began flicking his tongue in and out of his mouth, like a lizard. The tenant still didn't get the hint until the landlord began mimicking his hands. **Page 154 - 6th, Character 1st sentence and 7th Character whole paragraph.**
Gregg is watching Little Jack and when Jack gets back / Little Jacks hands are glued to a liquor bottle and he's watching Scar face.	Scar Face **Def Exhibit J - PAU-2-423-720** **Page 51 – 1st Paragraph** **(More)** The landlord at this point began talking like Al Pacino in Scar Face, saying to the potential tenant "What are you talking about congo!!

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Def Exhibit G – TXU-775-750 **Page 65 2nd paragraph 2nd sentence**
Deleted Scene Bernie Focker – Screaming out loud jungle screams. **Def Exhibit D-Meet the Fockers (DVD).**	Jo Jo hearing the calls of the wild retorted back in loud jungle screams. **Def Exhibit H** **Page 132 – 11th Character 2nd and 3rd sentence.**
Fockers make sleeping arrangements **Def Exhibit D-Meet the Fockers (DVD).**	Landlord claimed he could sleep anywhere it didn't matter to him the weight room, the attic, the couch, his car, a hotel room and in the summer he sleeps on the porch. **Def Exhibit G TXU 775-750** **Page 65 1st Paragraph.**
Deleted Scene Bernie Focker – We all have our little issues,	The pattern of behavior in this novel is called sick humor the actions of these characters creates the type of ambivalence and animosity that severs numerous relationships as you will see, instilling the apprehension, fear

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exh D (MTF).	**and anxiety that creates the onset of the chaotic environment. The Character portrayed in this story all suffer from a variety of disorders which makes this novel entertaining.** **Def Exh G – TXU-775-750** **Page 3 – 2nd, Paragraph**
Roz Focker the rubber mammary gland for the child could cause confusion Jack Brynes – A Dysfunctional was in dire need of a hug meaning as a child he didn't get the love and affection he needed.	Dysfunctionalism It is sad to say that most dysfunctional parents are unable to comprehend or diagnose that they suffer the syndrome and are in dire need of therapy themselves. The problem that we are faced with here is how could these parents help their children if they are not cognizant that they are psychological impaired. It's like the blind leading the blind. These parents and offspring need to seek the proper medical

Meet the Fockers	The Tenant and/or The Dysfunctionals
Roz claims Jack is in denial. Jack's Family Legacy Jack Brynes – Marriage needed counseling. Gregg was dysfunctional in his own way as his parents. Frozen Caveman Concept	attention to treat the ailment that has been prevalent throughout their family history for God knows how long! The lack of understanding and stubbornness to deal with this problem creates barriers and an inability for these chaps to function rationally in a normal society. However, the parents that finally realize through the failures and tragedies of their offspring that something indeed is wrong and continues to go through life turning a blind eye are usually to blame. The consequential effects are inevitable as these parents await fate that could be quite devastating. The parents who go through life subterfuging

Meet the Fockers	The Tenant and/or The Dysfunctionals
Ferber v. Focker Method Jack Brynes is finally converted over fockerized. **Def Exhibit D-Meet the Fockers. (DVD).**	their guilt without any attempt of reconciling differences, have not learned anything. They only condone the behavioral pattern that will eventually destroy their families and destroy the lives of the next generation. You will come to term in this novel on how the offspring of the dysfunctional, deal with certain situations. These chaps are liable to use the abnormal techniques instilled or incorporated into their personalities as children. The course of conduct used or perpetrated by the dysfunctional in dealing with everyday crisis will show a pattern of behavior that is inappropriate, irrational, ignorant and even barbaric quite the contrary to a normal lifestyle.

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Def Exhibit G TXU 775-750 Page 2
Ferber v. Focker Method **Def Exhibit D-Meet the Parents. (DVD).**	We will have an opportunity to study some of the bizarre behaviorism and abnormal reactions of the dysfunctional as well as the rational people of society. **Def Exhibit H - PAU-283-460 Page 9 1st Paragraph**
Jack Brynes – Is teaching little Jack and shows little Jack he nurse card. He then states to Jack in a form of gay ridicule the card only comes in one gender.	The landlord tells the tenant that he'd fix him up on a hot date and she was on her way. The landlord explained to the tenant that she was a Nurse that he met at the psychiatric ward. Vinny told Stimmy to take a quick shower and get ready. After the shower Stimmy went into the downstairs bathroom to shave. Stimmy heard a thump outside the house. The bell rang Stimmy

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit D-Meet the Parents (DVD).	peaked out the window and saw a woman in a nurses uniform with a big head looking a bit strange as she was downing a bottle of beer. Stimmy opened the door and to his surprise the peculiar looking woman resembled the landlord with a wig on dressed like a bitch, he let out a sigh of disgust. Gay Ridicule **Def Exhibit G- TXU-775-750** **Page 123 – 1st Paragraph**
Bernie Focker – The bathroom is being renovated. **Def Exhibit D-Meet the Fockers (DVD).**	Vinny- The bathroom is in the process of renovations. **Def Exhibit H –PAU-2-283-460** **Page 89 1st Paragraph 3rd sentence.**
Roz Fockers's Senior Citizens class lassie come home . (Doggy Style).	Doggy style **Def Exhibit G – TXU-775-750** **Page 136 last sentence**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit D-Meet the Fockers (DVD).	
Isabelle - handsome little fucker	Fucker refers to individuals throughout all plaintiff's copyrights. Def Exhibit H- PAU-2-283-460 Pages 50,118.160,168,169,232 etc, etc, etc,.
Def Exhibit D-Meet the Parents (DVD)	The content of the material used in expressing this story may be a bit distasteful and offensive the author expresses his deepest apologies to you the reader. The reason for the decadent vocabulary use is incumbent to receive the kind of attention and recognition the author climaxes on. The inclination of such a reaction is to pursue the comical aspect of this novel to its fullest extent. **Def Exhibit G – TXU-775-750** **Page 5 – 1st Paragraph.**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Danny military school **Def Exhibit D-Meet the Fockers (DVD).**	(As the children grow into their teen years, they take with them, the experience of being exposed to a quasi military boot camp, which includes without limitation, the beatings, verbal and psychological abuse. This has been intertwined into their personalities. Making these individuals quite the characters they are in todays society. **Def Exhibit H – Pau 2 283-460** **Page 11 . 2nd, Paragraph**
The plan entailed Rendezous at the Oyster Drug for passports and the documents	The plan entailed Rendezvous at a sporting goods store to pick up a boat. **Def Exhibit H – Pau 2-283460** **Page 69. 1st Paragraph 3rd, sentence.**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Gregg only one at the airport. **Def Exhibit D-Meet the Fockers (DVD).**	Eddie only one at the airport. The rendezvous was to be at La Quardia Airport at approximately 8 a.m. Eddie was the first to arrive at the airport 5 a.m. in the morning, pacing back and forth. Ticket Agent- We may have a potential problem at the ticket counter. Last time I go with these fuckers. Ticket agent- he's not wrapped to tight! Ticket agent- we may have a potential problem **Def Exhibit H – PAU-2-283-460** **Page 167-Last paragraph.** **Page 168 – 1st & 4th, Character.**
Focker said grace at the table.	Grace at the table

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit C-Meet the Parents (DVD).	**Def Exhibit H - PAU-2-283-460 Page 54 8th Character 2nd sentence**
Bernie Focker – Rebel **Def Exhibit D-Meet the Fockers (DVD).**	Jo Jo (One of the sons Jo Jo had a rebel type of attitude, finding most of the ordinances , abnormal totally out of touch with reality. In a blatant defiance, humor was used in a form of ridicule, mocking such demented behavior. A sort of rebellion against the absurdity of such dysfunctional behavior. **Def Exhibit H – PAU-2-283-460 Page 11-4th paragraph 1,2 & 5 sentence.**
Jack Brynes is telling Gregg to feel the Manary Gland how real it feels. Gregg is actually feeling the prosthetic breast and claiming how real it feels. Pam and Dina were	Vinny sets up his rubber dolls acting as if they are real for carpool fare. Vinny actually kisses the rubber doll. Toll Booth Clerk startled

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
shocked for a second as they walk into the RV and caught Gregg feeling the fake breast. **Def Exhibit D – Meet the Fockers Deleted Scenes**	– What the fuck ! Actually witnesses Vinny making out with the rubber doll. **Def Exhibit H – Pau-2-283-460 Page 116 Last two paragraphs**
Roz Focker – Psychiatrist – Sex Therapist **Def Exhibit D – Meet the Fockers**	Dr. Bernstein is the Psychiatrist Character. The Tenant and/or The Dysfunctionals. **Def Exhibit H - PAU-2-283-460 Page 150 - 1st, Character**
Dina –This is the highlight of our twilight! **Def Exhibit D-Meet the Fockers (DVD).**	The family members would always be ready for something out of the ordinary like the Twilight Zone or Outer limits **Def Exhibit H – PAU-2-83-460 Page 14 next to last paragraph 3rd**

Meet the Fockers	The Tenant and/or The Dysfunctionals
	sentence. **Def Exhibit PAU-2-283-460** **Page 233 - 4th sentence last paragraph**
Jay Roach Commentary - Anxiety dream //// Gregg Focker to look earnest tries hard to do the right thing// enough mileage off of Gaylord fockers Name /////// Little Jack - allied with Jack Brynes/obsession sign language character with a lot of layers of expression sign language and hand gestures/// Mammary Gland Jay Roach states in his commentary – That sometimes writers contribute but don't get credit. Jay Roach Claimed that	Jack Brynes – To extract main parts of The Tenant and/or The dysfunctioinals - CIA Character/ Lie Detector Test/ Hidden Video Camera/ I'm watching you /stalker/masculine / macho man / investigative scenes/ race home scene/ gay ridicule scene/Race Scene/ Engagement ring scene/ Pam These are all related to the Tenant Gregg Focker / Gay ridicule /Homo scenes/ Gaylord reference / queer / Nurse scene/ Sex paraphernalia scene Little Jack was brought

Meet the Fockers	The Tenant and/or The Dysfunctionals
the script had a lot of layers.	in to soften the tones on the sexually explicated sign language/ The manary gland / I'm watching you theory/ Child first word – profanity / Scar Face Scene Roz Focker brought in to emulate the Psychiatrist Character in The Tenant and/or The Dysfunctionals Roz Ferber v. Focker Method in bringing up children / Sex therapist to bring in the pornographic tapes / Police Officer – brought in to bring in the whole deviant sexual theory that emulates The Tenant and/or The Dysfunctionals Race Scene / Square Dance/ Lazer Gun / Stun Gun / Calibrating vehicle speeding / Bureau Child Welfare/Volts Scene/

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exh D (MTF)).	Referring to the Blue velvet – Porn parlors/ Rubber booby ------- Exact Scenes from The Tenant and/or The Dysfunctionals// Attorney Character brought in to emulate the Jo Jo character /// rebel // Stamina //psychologically stable to an extent// Sylvester impersonations/ One ball /Karate The Theologian Character/ Carpenter Character Biblical references Same as the Tenant and/or The Dysfunctionals with the exception of rating. A lot of Scenes are verbatim dialogue.
Dina mimicking the crazy sign in reference to Jack Byrne. **Def Exh D-(MTF)).**	Officer mimicking the crazy sign in reference to Jimmy. **Def Exh H- PAu-2-283-460**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Page 8 – 1st sentence
Roz Focker's – Couples Therapy Def Exhibit D-Meet the Fockers (DVD).	Doctor after having an in depth conversation with Vinny asked him if he could hold his hand this way they could knock off two birds with one stone. **Def Exhibit H** **Page 127 – 14 Char– last 2 sentences.**
Bernie Focker –Bragging about (Stamina) giving his wife a Saturday Matinee - **Def Exhibit D-Meet the Fockers (DVD).**	Mesmerized by Jo Jo's Stamina. **Def Exhibit** **Page 182 – 3rd, Character.**
Bernie Focker when the Byrnes pull into their driveway he is doing karate throwing kicks and punches. **Def Exhibit D-Meet the Fockers (DVD).**	Vinny standing in a karate stance throwing kicks and punches began talking Chinese fluently to the potential buyers. **Def Exhibit H -** **Page 52 – 4th Character.**
Bernie Focker – Look at those pecks. **Def Exhibit D-Meet the Fockers (DVD).**	Father in the tenant is a well built man **Def Exhibit J – PAU-2-380-629** **Page 2 – 5th. Paragraph**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	– 2nd, sentence.
Focker when the toilet broke in the RV – He put little Jack in front of him to shield the water from hitting him. **Def Exhibit D-Meet the Fockers (DVD).**	Vinny's theory "Every man for himself" selfish. **Def Exhibit –H – PAU-2-283-460** **Page 93-last sentence.**
I didn't catch Focker jerking on her passport photo	Whacking off insinuation
Isabelle handsome little "fucker" with an accent /////// Stay to raise your child?	"Fucker" is prevalent throughout the script little fucker referring to children in a comical aspect. Def Exhibit H – PAU-2-283-460 Pages 50,118,160,168,169,232, etc. etc. etc,. The content of the material used in expressing this story may be a bit distasteful and offensive the author expresses his deepest apologies to you the reader. The reason for the

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit D-Meet the Fockers (DVD).	decadent vocabulary use is incumbent to receive the kind of attention the author climaxes on. The inclination of such a reaction is to pursue the comical aspect of this novel to its fullest extent. **Def Exhibit G – TXU-775-750** **Page 5 – 1st paragraph**
Jack Brynes hears the Fockers having sex exhibiting a lot of noise. Jack Brynes – can you believe this we are forced to sleep in a Dutch Bordello. **Def Exhibit D-Meet the Fockers (DVD)**	Everything seemed to have gone silent to their amazement they then heard the sounds of a woman in ecstasy making passionate love. Give it to me baby! **Def Exhibit H-** **Page 57 12th,** **Character 2nd , 3rd** **Page 57 13th Character**
Baby Ferber Method – Let the child cry it out **Def Exhibit D-Meet the Fockers (DVD).**	Dysfunctional Method A Baby is crying awaiting a response, the child looks over it's crib and finds both his parents in fetal position also crying. **Def Exhibit G – TXU-**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	775-750 **Page 13 – 1st sentence.**
Jack Brynes – Can I get some privacy? **Def Exhibit D-Meet the Fockers (DVD).**	I have to talk to my brother in private stop eavesdropping. **Def Exhibit H Pau – 2-283-460** **Page 86 12th, Character**
Bernie Focker – Official quarter Gay goes both ways . Jack Brynes "I bet he does "gay" insinuation. **Def Exhibit D-Meet the Parents (DVD).**	Stimmy thought maybe this chap went both ways. **Def Exhibit H** **Page 137 – 1st Par. next to last sentence.**
Macho football game. Bernie Focker paints his face/ Bernie Focker does his Indian war **Def Exhibit D-Meet the Fockers (DVD).**	Father a man in military fatigues with his face painted. **Def Exhibit H - Pau-2-283-460** **Page 80 last Paragraph -1st, sentence.** Indian War Dance - It sounded like an Indian war party, rousing each other up like a war dance before the attack. **Def Exhibit – H – Pau-2 -283-460**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Page 130 - 4th Character 3rd & 4th sentence.
Bernie Focker intercepts Jack Burns and tackles him. **Def Exhibit D-Meet the Fockers (DVD).**	Guard one tackles Tommy before he can get to Stimmy. **Def Exhibit J – PAU-2-423-720** **Page 131 - 2nd - sentence.**
Roz Focker – Jack is in denial **Def Exhibit D-Meet the Fockers (DVD).**	However, the parents that finally realize through failures and tragedies of their offspring that something is indeed wrong and continues to go through life turning a blind eye are usually to blame. **Def Exhibit G – TXU 775-750** **Page 2 - 1st sentence.**
Truth Serum Scene – As Greggs true feelings began to emerge. **Def Exhibit D-Meet the**	Truth Serum Scene –The liquor began to work like a "Truth Serum" , as the chap true feelings began to emerge.

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Fockers (DVD)	**Def Exhibit H - PAU-2-283-460 Page 77 - 5th Paragraph 1st and 2nd sentence.**
Gregg Focker passes out on the floor from being drunk. **Def Exhibit D-Meet the Fockers (DVD).**	.Jo Jo passes out on the floor from being drunk. **Def Exhibit H - PAU-2-283-460 Page 78 – 8th Character.**
Virgin Scene **Def Exhibit D-Meet the Parents (DVD)**	Virgin Scene – Question – Who was your first love ? **Def Exhibit H Pau 2 - 283-460 Page 172 1st Paragraph**
Roz likes sexual detail. **Def Exhibit D-Meet the Fockers (DVD)**	Detail about her ordeal **Def Exhibit H - Page 174 5th, Character 2nd, sentence.**
Bernie Focker – Said that his son will go both ways. Jack replied am sure he does. **Def Exhibit D-Meet the Fockers. (DVD).**	Stimmy thought maybe the chap went both ways. **Def Exhibit H – Pau-2-283-460 1st Paragraph last line.**
Pam sister "Volley Ball	Volley Ball had just broke

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Scene" bloody nose. **Def Exhibit C Meet the Parents (DVD)**	her nose playing volleyball. **Def Exhibit F TXU 742-462** **Page 95 3rd paragraph middle to end.**
The Theologian Scene **Def Exhibit D-Meet the Fockers (DVD).**	The Theologian Scene studied theology **Def Exhibit H PAU 2-283-460** **Page 176 Paragraph 2**
Tackled and Intercepted Scene **Def Exhibit D-Meet the Fockers (DVD).**	Stimmy sees all three brothers in a Football Huddle whispering to one another. **Def Exhibit H PAU-2-283-460** **Page 225 1st, Paragraph 2nd, sentence.** Tackled and Intercepted Scene **Def Exhibit F TXU-742-462** **Page 109 - 1st Paragraph**

Meet the Fockers	The Tenant and/or The Dysfunctionals
The Theologian Character- With all these biblical references / Theologian , monk , Joseph was a carpenter etc. **The Theologian Character was developed.**	Police Officer 2 - The denial seemed somewhat stanch, some chaps denied meeting him altogether. (The cock began crowing so much it began singing a tune). Does anyone know this guy? **(Biblical Reference)** **Def Exhibit H – Pau –2-283-450** **Page 71 – paragraph 2 last 3 lines.** **Vinny (Didn't say a word to Simmy and kept eating, as if there were the "Last Supper" - Biblical Reference** **Def Exhibit H – Pau-2-283-450** **Page 92 – Last paragraph 1st Sentence.** **There was total silence**

Meet the Fockers	The Tenant and/or The Dysfunctionals
	as if someone was about to say Grace at the table. **(Biblical reference)** **(More)** **Def Exhibit H- Pau 2-283-450** **Page 54 –8th Paragraph 3rd sentence.** **The mother must have carried the cross.** **(Biblical reference)** **Def Exhibit H – Pau-2-283-450** **Page 134 - - 4th Character**
Kevin began looking at Isabelle claiming that Gregg had great taste in woman. Kevin then began speaking Spanish. Isabelle is talking to Kevin with the collar on he than takes the collar off. When Kevin threw his collar away it almost	Vinny the monk who allegedly studied Theology and the talk show host , stuttering Richie who happen to be the same chap taking a psychological and philosophical interest in the cross examination of the rape victim. **Def Exhibit H - PAU-2-**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
seemed as if he were hypocritical. **Def Exhibit D-Meet the Fockers (DVD).**	**283-460** **Page 176 2nd Paragraph**
Roz - Prosthetic Breast – not normal – Dysfunctional **Def Exhibit D-Meet the Fockers –(DVD).**	Prosthetic Dolls not normal. Dysfunctional **Def Exhibit H PAU 2-283-460** **Page 117 – 2nd, Character**
Jack Brynes set up the surveillance camera again. **Def Exhibit D- Meet the Fockers (DVD).**	The tenant set up surveillance equipment. **Def Exhibit G – TXU-775-750** **Page 109 4th paragraph last sentence.**
Gregg is touching to see how real the prosthetic breast felts- saying ho yeah it feels real. Dina and Pam and they were surprised to witness this behavior.	Vinny gave the clerk a car pool ticket. At about the same time, Vinny began once again embracing the passenger making out with her passionately, the passengers wig fell off). Toll Clerk (The toll booth clerk looked shocked for a

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Def Exhibit D-Meet the Fockers. (DVD)	second. The boss privy to the conversation heard the following.) What the fuck? Hey buddy! Your gonna have to pay full fare. **Def Exhibit H –Pau – 2-283-460** **Page 116 - 2 last paragraphs** Token booth clerk surprise
Gregg lied about the cat and most likely lied about everything.	Race scene – Vinny lied to the boss that he didn't have a car /// Vinny most likely put the ex-lax in the bosses coffee // Vinny was most likely the stalker// Vinny lied to his wife about his affair// Vinny most likely lied about everything.
Race Scene **Def Exhibit C & D Meet the Parents and Meet the Fockers.**	The boss began to drive as recklessly as Vinny pursuing the chap to find out if he was the alleged prankster. **Defendant Exhibit H PAU-2-283-460**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Page 118 – 3rd Paragraph
Highway Cop Keep your hands on the steering wheel Stay in the car .	Police Officer - Pull over to the side of the road, and keep your hands on the steering wheel. **Def Exhibit – H –PAU 2-283-460** **Page 35 – 8th Character.**
Bernie Focker runs towards the police car Police weapon is drawn	Vinny pulled over quickly and jumped out of his vehicle running up towards the patrol car nervously, in an attempt to avoid embarrassment of being ridiculed in front of his date.) Officers don't shoot ! Police weapons are drawn **Def Exhibit – H- 2-283-460** **Page 35 – 9th Character.**
Police Officer didn't I tell you to stay in the car,	Police Officer – I told you to stay in the car and keep your hands on the

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	steering wheel! **Def Exhibit – H -2-283-460** **Page 35 – 10th Character.**
What's the problemo Speeding going 55 mph in a 45 mph zone	What's the problem? Police Officer – We were goning to ask you that let's see speeding at 60 mph in a 30 mph zone – running steady red lights and driving recklessly . I'd say that constitutes a major problem. Now get in the back seat and keep your fucking mouth shut. **Def Exhibit H -2-283-460** **Page 36 1st paragraph**
They see Jack Brynes – Gregg starts running and is hit with Tazur gun volts they talk about volts////	Stimmy is hit with a lazer gun and stun gun Authoritative A chase ensued and

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
Focker in custody runs trying to get Jacks attention and is taken down by a lazar gun. Jack Burns – Stand down (Retired CIA – hits him with a stun gun	Vinny was taken down by a tranquilizer gun, after a short scuffle. **Def Exhibit H - Page 227 - 5th Paragraph – 3rd sentence.** Authoritative
Tells the cop to stand down or he'll be working security in an old age home.	Jumps out of the police cruiser makes it's U-turn and was no longer visible. Vinny ran out to the middle of the avenue and began grandstanding to the crowd and his date. He began screaming . The next time , you better know, who the fuck your pulling over. I'll have both you sum bags walking the fucking beat. Date – Is in the car nervously awaiting to find out what had happen. As Vinny began walking over to the car like a tough guy, he began flicking his wallet

Meet the Fockers	The Tenant and/or The Dysfunctionals
	open and close). Page 36 last Vinny cops leave flicks badge – I'll have those cops in the fucking circus .
Prosthetic breast (Rubber Boob) Police Officer – Look what we have here a rubber booby ---------- This is the pan in which your gonna fry ! Cop refers the Fockers as pappa and baby freak and the mother porn tapes as mama freak	Prosthetic Doll (Rubber Doll) The police through a thorough investigation found semen on the seats and 3 rubber blow up dolls in the back seat. Police - The investigation took a turn for the worst, because the police thought that the victim in this case was some sort of sexual deviant, who picked up a deranged hitchhiker.) He probably got what he deserved. **Def Exhibit H** **Page 120 Police 3rd**

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	Sentence to end.
(Freaks) Stereotyped and labeled as sexual deviants	Freaks of nature were exposed , stereotyped and labeled sexual deviants . **Def Exhibit H** **Page 176 Last Paragraph last sentence.**
Scene Love and hug our son I think it's the little jack in you crying out for a hug //// spare me the drugstore psychology.	Scene Pam the psychiatrist trying to figure out what was wrong with Jo Jo figuring that he was crying out for a hug.
Baby Jack puts on scarface with the remote and parents come in and see the TV on with the movie as the baby's hand is glued to a bottle of rum.	Say hello to my little friends **Def Exhibit G - TXU-775-750** **Page 6 7th sentence.** Vinny imitates scarface while at Paradise on the Water/ Scarface imitations prevalent throughout the scenes/ Father watches Scarface while in the process of

Meet the Fockers	**The Tenant and/or The Dysfunctionals**
	evicting the tenant
Fockers Isle	Paradise on the water
The Captain – Jack Bryns was the captain the title, However, Jay Roach in his commentary explains that they wanted the RV to also be a watercraft. Jack Brynes – Says, Let set sail while in the RV. **Def Exhibit D-Meet the Parents. (DVD).**	The Captain /Skipper. The skipper on board the craft. / The Captain carried off the beach like a raving lunatic. **Def Exhibit H - PAU 2-283-460** **Page 5th Character -1st sentence** **Page 70 Last paragraph next to last sentence.**
Rusty while talking to Gregg spits on the floor. Def Exhibit D-Meet the Parents. (DVD).	Vinny while speaking to his boss spits on the floor. **Def Exhibit H – PAU-2-283-460** **Page 147 - 2nd sentence**
Rusty takes his son to Hooters to eat another dysfunctional. Def Exhibit D-Meet the Parents. (DVD).	Jo Jo takes Stimmy to the Peep parlor. **Def Exhibit H –PAU-2-283-460** **Page 158 – 1st Paragraph**

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

_____X

CHIVALRY FILM PRODUCTIONS and JOSEPH ARDITO, Individually.,

Plaintiffs, **05 Civ.____**

-against-

NBC UNIVERSAL, INC.,
UNIVERSAL PICTURES COMPANY, INCORPORATED.,
UNIVERSAL STUDIOS, INC.,
UNIVERSAL STUDIOS LLC.,
UNIVERSAL CITY STUDIOS LLLP.,
UNIVERSAL CITY STUDIOS, INC.
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
DREAMWORKS, L.L.C.,
DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG,
DREAMWORKS PRODUCTIONS LLC,
DREAMWORKS, INC.,
TRIBECA PRODUCTIONS INC.,
AMY SAYRES,
NANCY TENENBAUM FILMS INC.,
NANCY TENENBAUM,
TWENTIETH CENTURY FOX FILM CORPORATION,
EVERYMAN PICTURES,
JAY ROACH,
JAY ROACH D/B/A EVERYMAN PICTURES,

Defendants,

_____X

COMPLAINT
TRIAL BY JURY DEMANDED

Plaintiffs, **CHIVALRY FILM PRODUCITONS AND JOSEPH ARDITO**, complaining of the above defendants (collectively, the "Defendants"), respectfully allege, upon information and belief as follows:

JURISDICTION AND VENUE

1. This action is brought under the Federal Copyright Act of 1976, as amended, 17 U.S.C.A.Section. seq. This court has Federal question jurisdiction pursuant to 28 U.S.C.A. 1331. This action also arises under plaintiffs Claim II for an accounting that is a supplemental claim that this Court has jurisdiction over Count II is based on supplemental jurisdiction pursuant to 28 U.S.C. Section 1367. This action also arises under the Racketeer Influenced and Corrupt Organization (R.I.C.O) pursuant to Title 18 U.S.C. 1962 Section (c) - (a) Federal Wire Fraud. (b) Federal Mail Fraud. This action also arises under 15 U.S.C. Section 1125 (a) and Section 43 (a) of the Lanham Act. This action also arises under the Canadian Copyright Statute, the United Kingdom's Copyright Statute, Australia's Copyright Statute of 1968 and Japan's copyright Law, all of which are enforceable by U.S. citizens under applicable treaties and conventions, under the Universal Copyright Convention the ("UCC"), and under the Berne Convention for the Protection of Literary and Artistic Works ("The Berne Convention"). The Judicial Code (28 U.S.C.A. Section.1338 (a)).

2. Because the United States, Canada, the United Kingdom, Australia, and Japan are all signatories to the UCC and the Berne Convention, and because this Court has personal jurisdiction over each of the Defendants, plaintiffs Chivalry Film Production and Joseph Ardito are entitled to seek and obtain both nationwide and extraterritorial injunctive relief and damages in this Court, as a result of the Defendants' infringement of plaintiffs Chivalry Film Productions and Joseph Ardito's copyrights in each of the above-referenced countries, pursuant to the copyright laws of each of those countries, respectively.

3. Venue lies in this District pursuant to 28 U.S.C. Section 1391 (b) and (c) and 1400 (a). The claim in suit arose within this District.

THE PARTIES

4. Plaintiffs, Chivalry Film Productions is a sole proprietorship duly organized existing under and by virtue of the laws of the State of New York, County of New York.

5. Plaintiffs, Chivalry Film Productions has a principle place of business and office address located at 150 William Street, 19th floor, State of New York, County of New York, State of New York.

6. Plaintiffs, JOSPEH ARDITO has an office address located at 150 William Street, 19th floor, State of New York, County of New York, State of New York.

7. Plaintiff Joseph Ardito is the sole owner of Plaintiff Chivalry Film Productions.

8. Plaintiff Joseph Ardito is the owner of the book and screenplay known and registered as "The Tenant" and/or "The Dysfunctionals". See Exhibits (a through e).....

(a). Copyright 1. Registration Number - Txu- 775-750 (COHM) /Title - "The Tenant" / Claimant Owner JOSEPH ARDITO / Created 1996 /Title on Application "The Dysfunctionals".

(b). Copyright 2. Registration Number -Txu-742-462 (COHM) /Claimant Owner JOSEPH ARDITO / Created 1996 /Registered May 15th, 1996 /Title on Application "The Dysfunctionals".

(c). Copyright 3. Registration Number - Pau-2-283-460 (COHM) /Title "The Tenant"/Claimant Owner JOSEPH ARDITO/ Created 1998 /Registered April 27th, 1998.

(d). Copyright 4. Registered Number -Pau-380-629 (COHM)/Title -" The Tenant" /Claimant Owner JOSEPH ARDITO/Registered February 2nd, 1999/ Author on Application Chivalry Film Productions (employer for hire of VINCENZO T. ARDITO/ Script JOSEPH ARDITO.

(e). Copyright 5. Registered Number Pau- 2-423-720 (COHM)/Titled "The Tenant"/Claimant Owner JOSEPH ARDITO/Registered July 19th, 1999.

Pursuant to Judge Lynch's Opinion and Order dated January 11, 2006, Paragraphs 9 through 1939 are stricken, except for such paragraphs as allege that any defendant was a producer and/or distributor of the movies "Meet the Parents" and "Meet the Fockers."

NBC UNIVERSAL, INC.

17. Upon information and belief, at all relevant times mentioned herein, defendant, NBC UNIVERSAL, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

18 Upon information and belief, at all relevant times mentioned herein defendant, NBC UNIVERSAL, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

19. Upon information and belief, at all relevant times mentioned herein, defendant, NBC UNIVERSAL, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

20. Upon information and belief, at all relevant times mentioned herein defendant, NBC UNIVERSAL, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

UNIVERSAL PICTURES COMPANY, INCORPORATED

28. Upon Information and belief, at all relevant times mentioned herein, defendant, UNIVERSAL

PICTURES COMPANY INCORPORATED, was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

29. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL PICTURES COMPANY, INCORPORATED was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

30. Upon Information and belief, at all relevant times mentioned herein, defendant, UNIVERSAL PICTURES COMPANY INCORPORATED, was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

31. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL PICTURES COMPANY, INCORPORATED was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

UNIVERSAL STUDIOS, INC.

39. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

40. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

41. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL

STUDIOS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

42. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

UNIVERSAL STUDIOS LLC

50. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS LLC, was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

51. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS LLC, was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

52. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS LLC, was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

53. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL STUDIOS LLC, was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

UNIVERSAL CITY STUDIOS LLLP

61. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS LLLP, was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

62. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS LLLP, was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

63. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS LLLP, was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

64. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS LLLP, was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

72. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

73. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

74. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

75. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

83. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

84. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

85. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

86. Upon information and belief, at all relevant times mention herein, defendant, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

DREAMWORKS, L.L.C.

96. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, L.L.C., was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

97. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS, L.L.C., was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

98. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, L.L.C., was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

99. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS, L.L.C., was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG

109. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

110. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG, was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

111. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG, was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

112. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG, was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

DREAMWORKS PRODUCTIONS LLC

122. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS PRODUCTIONS LLC was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

123. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS PRODUCTIONS LLC was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

124. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS PRODUCTIONS LLC was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

125. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS PRODUCTIONS LLC was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

DREAMWORKS, INC

135. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, INC., was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

136. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS,

INC., was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

137. Upon information and belief, at all relevant times mention herein, defendant DREAMWORKS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

138. Upon information and belief, at all relevant times mention herein, defendant, DREAMWORKS, INC., was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

TRIBECA PRODUCTIONS INC.

145. Upon information and belief, at all relevant times mention herein, defendant TRIBECA PRODUCTIONS INC. was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

146. Upon information and belief, at all relevant times mention herein, defendant, TRIBECA PRODUCTIONS INC. was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

147. Upon information and belief, at all relevant times mention herein, defendant TRIBECA PRODUCTIONS INC. was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

148. Upon information and belief, at all relevant times mention herein, defendant, TRIBECA PRODUCTIONS INC. was and is one of the

distributors of said Motion Picture entitled "Meet the Fockers".

AMY SAYRES.

155. Upon information and belief, at all relevant times mention herein, defendant AMY SAYRES was and is one of the Producers of said Motion Picture entitled "Meet the Parents"

156. Upon information and belief, at all relevant times mention herein, defendant, AMY SAYRES was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

157. Upon information and belief, at all relevant times mention herein, defendant AMY SAYRES was and is one of the distributors of said Motion Picture entitled "Meet the Parents"

158. Upon information and belief, at all relevant times mention herein, defendant, AMY SAYRES was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

NANCY TENENBAUM FILMS INC.

165. Upon information and belief, at all relevant times mention herein, defendant NANCY TENENBAUM FILMS INC. was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

166. Upon information and belief, at all relevant times mention herein, defendant, NANCY TENENBAUM FILMS INC. was and is one of the

Producers of said Motion Picture entitled "Meet the Fockers".

167. Upon information and belief, at all relevant times mention herein, defendant NANCY TENENBAUM FILMS INC. was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

168. Upon information and belief, at all relevant times mention herein, defendant, NANCY TENENBAUM FILMS INC. was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

NANCY TENENBAUM

175. Upon information and belief, at all relevant times mention herein, defendant NANCY TENENBAUM was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

176 Upon information and belief, at all relevant times mention herein, defendant, NANCY TENENBAUM was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

177. Upon information and belief, at all relevant times mention herein, defendant NANCY TENENBAUM was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

178 Upon information and belief, at all relevant times mention herein, defendant, NANCY TENENBAUM was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

TWENTIETH CENTURY FOX FILM CORPORATION

186. Upon information and belief, at all relevant times mention herein, defendant TWENTIETH CENTURY FOX FILM CORPORATION was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

187. Upon information and belief, at all relevant times mention herein, defendant, TWENTIETH CENTURY FOX FILM CORPORATION was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

188. Upon information and belief, at all relevant times mention herein, defendant TWENTIETH CENTURY FOX FILM CORPORATION was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

189. Upon information and belief, at all relevant times mention herein, defendant, TWENTIETH CENTURY FOX FILM CORPORATION was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

EVERYMAN PICTURES

198. Upon information and belief, at all relevant times mention herein, defendant JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

199. Upon information and belief, at all relevant times mention herein, defendant, JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

200. Upon information and belief, at all relevant times mention herein, defendant EVERYMAN PICTURES was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

201. Upon information and belief, at all relevant times mention herein, defendant EVERYMAN PICTURES was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

JAY ROACH

214. Upon information and belief, at all relevant times mention herein, defendant JAY ROACH was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

215. Upon information and belief, at all relevant times mention herein, defendant, JAY ROACH was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

JAY ROACH D/B/A EVERYMAN PICTURES

224. Upon information and belief, at all relevant times mention herein, defendant JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the Producers of said Motion Picture entitled "Meet the Parents".

225. Upon information and belief, at all relevant times mention herein, defendant, JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the Producers of said Motion Picture entitled "Meet the Fockers".

226. Upon information and belief, at all relevant times mention herein, defendant JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the distributors of said Motion Picture entitled "Meet the Parents".

227. Upon information and belief, at all relevant times mention herein, defendant JAY ROACH D/B/A EVERYMAN PICTURES was and is one of the distributors of said Motion Picture entitled "Meet the Fockers".

NATURE OF THIS ACTION

1940. This action arises out of a comprehensive premeditated scheme carefully designed and calculated with intent through deliberate and willful acts of the defendants in concert, a scheme to intentionally deprive and defraud plaintiffs of their Federal Certificates Of Copyright Registration, rights secured and protected to them from infringement of his own, origination, creation, and/or development of his literary screenplay, entitled "The Tenant" and/or "The Dysfunctionals" **(Certificates of Copyright Registrations (a) Txu 742-462, (b) Txu 775-750, (c) Pau 2-380-629, (d) Pau 2-423-720, (e) Pau 2-283-460)** these manuscripts are entitled "The Tenant" and/or "The Dysfunctionals" identified as a comical satires ridiculing dysfunctional families.

1941. On or about January, 2005 this plaintiff viewed "Meet the Fockers" the character analysis and movie seemed very similar to that of Plaintiffs copyrighted manuscripts. After viewing "Meet the Fockers" the following day this plaintiff viewed "Meet the Parents", after viewing "Meet the Parents" it was quite clear and evident to this plaintiff, that these screenplays were in fact a blatant copyright infringement of Plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscripts, stolen character analysis, stolen motion picture, etc.). Plaintiff then notified the Los Angeles police in reference to a pending complaint made on or about August 21st, 1998 Complaint **(#980626165)** relating to plaintiffs stolen Federal Copyrighted Works (stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen motion picture, etc).

1942. The defendants released a screenplay motion picture entitled "Meet the Parents" and a derivative screenplay motion picture entitled "Meet the Fockers". The defendants intentionally, deliberately and willfully released to the general purchasing public (2) separate movies, video reproduction, DVD and/or CD ROMS, electronic and/or magnetic tapes, and or other electronic magnetic movie motion pictures, productions entitled "Meet the Parents" and "Meet the Fockers" including its pre-sequel and/or sequels which consists of parts of the same identical synopsis, theories, character analysis, ideas, etc.

1943. Each of these 2 movie motion picture productions entitled "Meet the Parents" and "Meet

the Fockers" was prepared, created, developed and proscribed by said defendants and so released for viewing and purchase, by the general purchasing public in movie theaters, on video(s) reproductions, and other electronic and/or magnetic tape devices and by methods of reproductions recordings (DVD), video, CD-ROM, cable television reruns on national television and syndication television, Pay Per View, movies made for television and international/foreign viewing by the general public throughout the world, by means of Foreign, International, Domestic, Interstate and Interstate commerce. (Satellite devices, computer software via e-mail, United States Postal Service, United States Mail Service, mail and wire transfers and communications, publications, distributions) contained substantial material parts, components thereof, in fraud, deceit and deception of plaintiffs protected and secured registration of Plaintiffs copyrights Certificates of Copyrights (Txu 742-462, Txu 775-750, Pau 2-380-629, Pau 2 423-720, Pau 2 –283-460) comical satires entitle "The Tenant" and/or "The Dysfunctionals" without the expressed, written or oral, and exclusive permission, consent and authority of Plaintiffs in violation of plaintiffs rights secured by and under the Copyright Act of 1976, as amended, 17 USC Sec 101 et seq.

1944. The Defendants each of them were all members of a group of the movie motion picture producers, directors, officers, authorized agents, benefactors, editors, screenwriters, movie composers, movie motion pictures, distributors and movie production companies were all conspirators, who agreed between and among themselves to engage act conduct and/or perform and did engage in criminal conduct and /or perform and are engaging in criminal

activities and acting conducting and/or performing in acts of wrongful deception, misrepresentation, fraud, deceit to the plaintiffs and that of the purchasing public; wrongful deprivation of wrongful deception of plaintiffs good name and reputation, the wrongful deprivation of the plaintiffs rights to public recognition and credit as a screen writer, composer, editor, developer and /or creator, screen treatment writer, composer editor and creator of certain copyrighted literary and/or artistic work(s) and the owner of the copyrighted screenplays -entitled - The Tenant and/or The Dysfunctionals".

"AS AND FOR A FIRST CAUSE OF ACTION ON BEHALF OF PLAINTIFFS AND AGAINST DEFENDANTS FOR SAID "COPYRIGHT INFRINGEMENT"

1945. Plaintiffs Chivalry Film Productions and Joseph Ardito repeat, reiterate and re-allege each and every allegations set forth in Paragraphs numbered (1) through (1944) This claim arises under Sections 502, 504 and 505 of the Copyright Act; under Chapter 55, Section 20 of Canada's Copyright Statute, Including Protection for Works Originating in Countries Members of the Berne Union; under Part 1, Chapter VI, Section 96 of the United Kingdom's Copyright Law, under Part V, Division 2, Section 115 of Australia's Copyright of 1968: under Chapter VI, Article 112 of Japan's Copyright Law; under the UCC; and under the Berne Convention and/or all other applicable International and/or Foreign copyright protection laws and/or statutes.

1946. Under all of the aforementioned applicable statutes and conventions, plaintiffs Chivalry Film Productions and Joseph Ardito complied with the copyright laws of the United States and all other governing copyrights, and secured the exclusive rights and privileges in and to the Federal Copyrighted Works (Literary/Artistic consisting of screenplay, manuscript, treatment, and/or synopsis and motion picture screenplay entitled"The Tenant" and/or "The Dysfunctionals" and the plaintiffs are the exclusive owners of the "The Tenant" and/or "The Dysfunctionals" the aforesaid project that has been blatantly infringed upon by the defendants. Plaintiff Joseph Ardito has obtained a Certificate of Registration with respect to said screenplay "The Tenant" and/or "The Dysfunctionals". A copy of said certificates is attached: **See Exhibit (a) (b) (c) (d) and (e)** and incorporated by this reference, plaintiffs are and have been the sole and exclusive proprietors of all rights, titles and interest in the above copyrights.

1947. The plaintiffs constitute the original works and copyrightable subject matter under the laws of the United States, the United Kingdom, Canada, Australia and Japan and/or other sovereign nations have never dedicated said original works and copyrightable subject to the public, defendants or anyone else.

1948. The plaintiffs have never sold, assigned, licensed or otherwise transferred any of his exclusive copyright interest to any of the defendants or anyone else.

1949. On or about October 6th, 2000 and prior and subsequent thereto the defendants, working in concert, individually and/or collectively produced a screenplay motion picture entitled **"Meet the Parents"** and on or about December 22nd, 2004 and prior and subsequent thereto the defendants, working in concert, individually and/or collectively produced a derivative screenplay motion picture entitled **"Meet the Fockers"** in which they copied in substantial parts from plaintiffs stolen Federal Copyrighted Works (Literary/Artistic consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc and or aforementioned project without the knowledge, permission and/or consent of plaintiffs. Since that time, defendants, without the knowledge, permission and/or consent of plaintiffs, produced, released, performed, and/or otherwise broadcast and permitted others to produce, release, distribute, perform and/or otherwise broadcast the stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen motion picture, etc.) under the title "Meet the Parents" and a derivative screenplay motion picture entitled "Meet the Fockers" on television and/or other media have formulated and implemented policies related to the origination, formulation, development, and/or creation of intellectual properties for purposes of commercial exploitation by and through motion picture films, distribution of motion picture films by and through alternative entertainment delivery vehicles including, but not limited to compact digital disc, video cassette, DVD, CD-ROM, cable television, including Pay Per View and affiliated commercial

exploitative means, both domestically and internationally. All for the sole purpose of profit to defendants, and to plaintiffs damage.

1950. Defendants, have infringed, are infringing and continue to infringe upon Plaintiffs copyrighted works.

1951. Defendants, directly or indirectly, in concert, individually and/or collectively together have received and continue to receive extensive monies, profits and gains as a result of their unlawful infringement upon defendants copyrighted works in connection with their production, sale and/or distribution of the movie "Meet the Parents".

1952. Defendants, directly or indirectly, in concert, individually and/or collectively together have received and continue to receive extensive monies, profits and gains as a result of their unlawful infringements upon plaintiffs copyrighted works in connection with their production, sale and/or distribution of the movie "Meet the Fockers".

1953. That, as a result of the aforementioned, the Court require the defendants, each of them, together and/or individually, account to Plaintiffs for all gains, profits and/or advantages derived by defendants from each infringement upon plaintiffs copyrighted works with respect to their production, sale and distribution of the aforementioned movies – "Meet the Parents" and "Meet the Fockers".

1954. As a result of the defendants conduct and infringement upon plaintiffs copyrighted works, as

aforementioned, plaintiffs have suffered extensive money damages and have been otherwise damaged.

1955. By reason of the foregoing, plaintiffs demands judgment from the defendants in an amount of **$500,000,000,000.00 (FIVE HUNDRED BILLION DOLLARS).**

AS AND FOR A SECOND CAUSE OF ACTION ON BEHALF OF THE PLAINTIFFS AND AGAINST THE DEFENDANTS FOR UNJUST ENRICHMENT

1951. The plaintiffs repeat, reiterate and re-allege each and every allegation set forth in paragraphs numbered (1) through (1950) of the complaint inclusive with the same force and effect as if fully set forth fully and at length herein.

1952. By virtue of the "defendants" aforesaid acts, as set forth above, the defendants, working in concert individually and/or collectively in conjunction with one another distributed the plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc.) and unfairly without authorization for publication, or distribution, published, marketed, licensed, sold and/or otherwise commercially exploited by and through motion picture films by and through alternative entertainment delivery vehicles including, but not limited to , compact digital disc, video cassette, DVD, CD-ROM, cable television, including Pay Per View, and affiliated commercial exploitative means, both

domestically and internationally "The Tenant" and/or "The Dysfunctionals". The defendants working in concert individually and/or collectively used the stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc.), all for their sole interest and with the express intent to build motion picture industry and attendant businesses, and to deprive the plaintiffs of their rights, title, interest, profits and the benefits thereof.

1953. By virtue of the aforesaid acts, as set forth above, the defendants working in concert, individually and/or collectively distributed the plaintiffs stolen aforementioned project (stolen novel, stolen synopsis, stolen notes, stolen ideas, stolen manuscript, stolen character analysis, etc.) stolen screenplay and stolen motion picture, based upon the unfair and unauthorized publication, distribution, marketing, licensing, sale and/or otherwise commercial exploitation means both domestically and internationally of the plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc.) "The Tenant" and/or "The Dysfunctionals". The defendants working in concert used the stolen aforementioned project (stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc.) all for the sole interest and with the express intent to build their motion picture industry and attendant businesses, and to deprive the plaintiffs of their rights, title, interest, profits and benefits thereof, said defendants earned monies

and received other benefits to which they would not otherwise have been entitled, including but not limited to the monies and/or profits generated by motion picture sales, Pay Per View, National television, Syndication television, International and Foreign viewing, DVD sales, CD-ROM, video cassette, etc, and the increased profitability and/or growth of the defendants motion picture industry, etc.

1954 By virtue of the joint and several acts as set forth above, the defendants in concert, individually and/or jointly, collectively in conjunction with one another in distributing both domestically and internationally owe the plaintiffs an accounting of all the monies and/or profits generated by the motion pictures sales and the increased profitability and/or growth of the defendants motion pictures and businesses which resulted from the unauthorized publication, marketing, distribution, licensing, sale and/or other commercial exploitations and/or uses of the plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc.) entitled "The Tenant" and/or "The Dysfunctionals".

1955. By reason of said defendants blatant Federal Copyright Infringement and aforesaid actions said defendants have been unjustly enriched, at the expense of the plaintiffs in an amount as yet undetermined but believed to be not less than **$10,000,000,000.00 (TEN BILLION DOLLARS).**

AS AND FOR A THIRD CAUSE OF ACTION ON BEHALF OF THE PLAINTIFFS AND AGAINST THE DEFENDANTS FOR RICO VIOLATION

1956. The plaintiffs repeat, reiterate and reallege each and every allegations set forth in paragraphs numbered (1) through (1955) of the complaint inclusive with the same force and effect as if the same were set forth fully and at length herein.

1957. Plaintiffs are the "persons" within the meaning of 18 U.S.C Section 1961 (3) and 1964 (c).

1958. The defendants in this action NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS INC, UNIVERSAL STUDIOS LLC, UNIVERSAL CITY STUDIOS LLLP, UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS L.L.C, DREAMWORKS, LLC d/b/a DREAMWORKS SKG, 1959. DREAMWORKS PRODUCTIONS L.L.C., DREAMWORKS, INC., TRIBECA PRODUCTIONS INC, AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH and/or D/B/A EVERYMAN PICTURES, INC., and/or their officers, agents and/or employees, Parent Companies, subsidiaries and/or affiliates, partners and/or joint ventures and/or persons within the meaning of 18 U.S.C Sections 1961 (3) (4) and 1962 (a) - (d).

1959. Defendants, NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY,

INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, LLC, DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS INC., TRIBECA PRODUCTIONS INC, AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES. INC., and their employees, agents, officers were a group of persons associated together in fact for the common purpose of carrying out the fraudulent scheme described in this Complaint: namely, stealing Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc,) from Plaintiffs, among others. The defendants then perpetrated in concert their comprehensive scheme to represent to the public that said screenplays were that of their own ideas, creations, and resources. The defendants unauthorized, unlawful scheme and design victimized and violated the Federal Copyrights belonging to the plaintiffs. The defendants NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., DREAMWORKS, LLC., DREAMWORKS LLC. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS INC.,

TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES., and their agents, employees and officers constitute an association-in-fact enterprise within the meaning of 18 U.S.C. Section 1961 (4) and 1962 (a) - (d). Copyright Infringement by and through the commission of a crime. During all relevant times, these Enterprises were engaged in and their activities affected by interstate and foreign commerce.

1960. Defendants had acquired plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc.) by and through the commissions of a crimes engaging in such conduct and activity, intended and designed to feloniously acquire, fraudulently acquire, and/or surreptiously with the intent of converting said stolen script into a project of their own. The defendants in a distorted manner blatantly went through extremes in revisions and manipulation in an attempt to conceal and subterfuge said crime by revising said screenplay. The defendants then actually claimed copyright to plaintiffs stolen Federal Copyright Works (Literary/Artistic consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc.) through the Library of Congress claiming the ideas and scripts were that of their own, this was not only totally absurd but outrageous. These acts

perpetrated by the defendants were all intentionally committed for their own personal and/or business gains and commercial exploitation (both Domestically and Internationally) purposes for production, publications and distribution for reproduction.

1961. The defendants pattern of racketeering activity consisted of Defendants aiding and abetting the commission of countless acts of federal Interstate Transportation of stolen property obtained by a crime, fraud, false pretense and conversion re: Aiding and Abetting Title 18 U.S.C.A. Section 2314. Federal Interstate Transportation of Stolen Property obtained by a crime, fraud, false pretense and conversion re: Conspiracy. Federal Interstate Transportation of Stolen Property obtained by a crime, fraud, false pretense and conversion re: Conspiracy Title 18 U.S.C.A. Section 2315. Federal Interstate Receipt of Transported Stolen Property obtained by a crime, fraud, false pretense and conversion re: Aiding and Abetting Title 18 U.S.C.A. 2315: and Federal Interstate Receipt of Transported Stolen Property obtained by a crime, fraud, false pretense and conversion re: Conspiracy : Title 18 U.S.C.A. Section 2315 . Federal Interstate Mail and/or Federal Interstate Wire fraud, in violation of 18 U.S.C. Section (2) 1341 and 1343. Specifically, defendants NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP., DREAMWORKS, LLC, DREAMWORKS, L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS

PRODUCTIONS LLC., DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILM INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH., JAY ROACH D/B/A EVERYMAN PICTURES., and their employees, agents, officers engaged in a comprehensive scheme and crime and/or artifice with the intent to intentionally defraud and fraudulently obtain Federal Copyrights by obtaining plaintiffs Federal Copyrighted property through the commissions of crimes and ultimately obtaining money therefrom plaintiffs stolen Federal Copyrighted Works (Literary/Artistic Works consisting of stolen screenplay, stolen novel, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc) screenplays entitled "The Tenant" and/or "The Dysfunctionals" by and through the means of a crime, fraud, false pretenses, misrepresentations and above all representing to the public that said Defendants were producing such copyrighted materials within their own authority, rather than obtaining such literary works (Federal Copyrighted Materials) outside their authority by lawful means.

1962. To execute this comprehensive scheme or artifice, defendants NBC Universal, Inc., Universal Pictures Company, Inc., UNIVERSAL STUDIOS, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED, UNIVERSAL STUDIOS, INC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG,

DREAMWORKS PRODUCTIONS LLC., DREAMWORKS INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM., TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES, transmitted or caused to be transmitted by means of Federal Wire Communications in Interstate and/or Foreign Commerce, and also caused matters and things to be placed in any post office or authorized depository, or deposited or caused to be deposited by following matters or things to be sent or delivered by private or commercial Interstate carrier (the "Mailings"):

1963. Federal Interstate Wiring and /or Federal Interstate Mailings of Plaintiffs stolen Federal Copyrighted Works (stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc,) The stolen Federal Copyrighted Works went between Los Angeles and various cities and states throughout the United States and Foreign countries.

1964. Federal Interstate Wiring and/or Federal Interstate mailings of Plaintiffs stolen script went between Los Angeles and various cities and states, foreign countries and to various people and movie motion picture production companies, including and not limited to NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS INC., UNIVERSAL CITY STUDIOS

PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS, L.L.C., d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, INC., JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES.

1965. Federal Interstate Wirings and/or Federal Interstate mailings of plaintiffs stolen script, characters analysis, ideas and scripts journey between Los Angeles and various cities and states and to various people and movie motion picture production companies, including and not limited to NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION , EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES.

1966. The funds transferred by wire between and among several banks located both within the state, and different states and foreign countries:

1967. The secret correspondences between defendants and each of them.

1968. Each Defendant participated in this comprehensive criminal scheme or artifice knowingly, intentionally and willfully with the specific intent defrauded Plaintiffs of their Federal Copyrighted Literary/Artistic Works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc., entitled "The Tenant" and/or "The Dysfunctionals".

1969. These acts of Federal Interstate Mail and Federal Interstate Wire Fraud constitute a pattern of racketeering activity as that term is defined in 18 U.S.C. Section 1961 (5). Each act of Federal Interstate Mail and/or Federal Interstate Wire fraud was executed by the same participants (NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP., DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC, NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES., and by their agents, employees and officers), by the same method (misrepresentations that were criminal, unauthorized and only available

through the commissions of a crime "stolen property" which defendants made fraudulent claims to plaintiffs stolen Federal Copyrighted Literary/Artistic Works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc,. Finally, as a result of each act of Federal Interstate Mail Fraud and/or Federal Interstate Wire fraud, this has caused the victim Plaintiffs to suffer irreparable damages (no monetary compensation for his Federal Copyrighted literary/ artistic work Infringement, no recognition as to the originator of the underlying idea or theme).

1970. As a direct and proximate cause of the Defendants acts of Federal Mail Fraud and/or Federal Wire Fraud, and its violation of 18 U.S.C. Section 1962 (a) - (d). Plaintiff have been injured in their business and property rights within the meaning of 18 U.S.C. Section 1964 (c), in that Plaintiff has lost literary/artistic recognition as the originator of the screenplay, novel, character analysis, ideas, etc and has further been monetary damaged in an amount not yet determined but in excess of **$10,000,000,000 (TEN BILLION DOLLARS)** in lost revenue, profits and royalties and has suffered consequential damages from unauthorized use and utilization of his copyrighted literary/artistic work.

AS AND FOR A FOURTH CAUSE OF ACTION FRAUD

1971. The plaintiffs repeat, reiterate and re-allege each and every allegation set forth in paragraphs

numbered (1) through (1970) of this complaint inclusive with the same force and effect as if more fully set forth at length herein.

1972. By virtue of their joint and several acts as set forth above, the defendants NBC UNIVERSAL, INC, UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC, UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS INC., UNVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC., DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES, intended to defraud plaintiffs of their copyright, ideas, title, characters, ownership interest, as well as profits. Defendants acquiring these stolen Federal Copyrights (Literary/Artistic Works consisting of stolen screenplay, stolen novel, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture etc.) developed a comprehensive premeditated scheme with intent to defraud plaintiff of his legal rights by intentionally revising said stolen Federal Copyrighted Works (stolen screenplay, stolen novel, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc) with the intent to manipulate and distort said screenplay for the purpose of concealing, obscuring, and subterfuging defendants blatant Copyright infringement. These defendants aided and abetted in concert individually and/or collectively they have contributed and perpetuated said crime of

fraud with the intent of concealing and subterfuging said stolen Federal Copyrighted Works. The defendants after said revisions of Plaintiffs Federal Copyrighted Works(Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc.) knowingly and intentionally claimed a copyright of their own, through the U.S. Library of Congress. This fraud was perpetrated with extreme malice and deception the magnitude of this massive fraud was not only perpetrated on the plaintiffs and the public but also on the Library of Congress when defendants so brazenly claimed a United States Federal Protected Copyright of their own misleading the Copyright Registration.

1973. By virtue of said defendants aforesaid criminal conduct, fraudulent acts, misrepresentations and intent to defraud Plaintiffs Federal Copyright Works Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen notes, stolen manuscript, stolen character analysis, stolen motion picture, etc,). The defendants have intentionally and willfully with the intent lead the public to believe that the ideas of their copyright and ownership was that of their own, for this reason the plaintiffs have been injured and damaged in an amount as yet undetermined but believed to be not less than **$10,000,0000,000.00. (TEN BILLION DOLLARS).**

AS AND FOR A FIFTH CAUSE OF ACTION ON BEHALF OF THE PLAINTIFFS AND AGAINST

THE DEFENDANTS IN VIOLATION OF THE LANHAM ACT.

1974. Plaintiffs Chivalry Film Productions and Joseph Ardito repeat, reiterate and reallege each and every allegation set forth in Paragraphs (1) through (1973) of this complaint inclusive with the same force and effect as if more fully set forth at length herein. This claim arises under 15 U.S.C. Section 1125 (a) and Section 43(a) of the "Lanham Act".

1975. Upon information and belief, Defendants NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC, UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC., DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES have all willfully deprived and infringed on plaintiffs stolen Federal Copyrights, (Literary/Artistic Works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc.) defendants have totally mislead copyright registration falsely implying that they are the creators.

1976. Such misattributions and/or omissions and/or misrepresentations and/or misuses constitute, in among other things, passing off and/or reverse passing off and/or palming off and/or reverse palming

off both actual and/or implied within the scope of prohibition in 15 U.S.C. Section 1125 and Section 43 (a) of the Lanham Act of false designation of origin and false representation in the advertising and sale of goods and service.

1977. The circulation of improperly credited Federal Copyright Infringement in Interstate and International Commerce is likely to confuse consumers and patrons about the true source of origination of said Federal Copyrights.

1978. The plaintiffs are deprived of the advertising value and good will that would stem from public knowledge of the true source of the Federal Copyright. Plaintiffs have suffered irreparable commercial and reputational injury as a screenwriter, composer, literary, and artistic . The defendants through said Federal Copyright Infringement have commercially exploited plaintiffs stolen Federal Copyrighted Works (Literary/Artistic works consisting of stolen screenplay, stolen novel, stolen synopsis, stolen manuscript, stolen character analysis, stolen motion picture, etc,) domestically and Internationally in a way that has **"sabotaged"** plaintiffs creation, characters, copyrights and company. Defendants have caused ill will and irreparable harm and damage.

1979. In addition, the Federal Copyright Infringement continues to be so crudely executed that they compromise plaintiffs reputation in the industry that plaintiffs are in fact the true creators.

1980. By reason of said defendants aforesaid actions, said defendants have violated the Lanham Act,

causing reputational injury and irreparable damages to plaintiffs in an amount as yet undetermined but believed to be not less than **$10,000,000,000.00 (TEN BILLION DOLLARS).**

AS AND FOR A SIXTH CAUSE OF ACTION ON BEHALF OF PLAINTIFFS AND AGAINST THE DEFENDANTS

1981.Plaintiff Chivalry Film Productions and Joseph Ardito, repeat, reiterate and reallege each and every allegation set forth in paragraphs (1) through (1980) in this complaint inclusive with the same force and effect as if more fully set forth at length herein.

1982. As a result of the defendants conduct and copyright infringement upon plaintiffs copyrighted works, as aforementioned , defendants are required to pay plaintiffs their attorney fees and cost related to this action.

1983. By reason of the foregoing, plaintiffs demand judgment for attorney fees, costs and all other fees related to this action, as well as any and all other relief that this court deems just and proper.

WHEREFORE, Plaintiffs prays for judgment against Defendants, jointly and severally, as follows:

Plaintiffs request that:

1. That Defendants each be held to have infringed on Plaintiffs copyright of "The Tenant" and/or "The Dysfunctionals".

2. That Defendants each be held for compensatory damages in an amount not now known, but believed to be in excess of **$10,000,000,000.00 (TEN BILLION DOLLARS)**, trebled damages pursuant to R.I.C.O.

3. That the Defendants each be held to have infringed Plaintiffs copyright "The Tenant" and/or "The Dysfunctionals" and be required to pay plaintiffs for said Copyright Infringement the sum of **$500,000,000,000.00 (FIVE HUNDRED BILLION DOLLARS)** as damages sustained by plaintiffs by reason of defendants' acts, and to account to plaintiff for all gains, profits and advantages derive from their acts, or any of them.

4. That on behalf of plaintiffs the defendants each be held and required to pay plaintiffs damages for Unjust Enrichment in an amount not now known, but believed to be in excess of **$10,000,000,000.00 (TEN BILLION DOLLARS).**

5. That on behalf of plaintiffs the defendants each be held and required to pay plaintiffs damages for RICO Violations trebled damages in an amount not now known, but believed to be in excess of **$10,000,000,000.00 (TEN BILLION DOLLARS).**

6. That on behalf of plaintiffs the defendants each be held and required to pay plaintiffs damages for Fraud trebled damages in an amount not now known, but believed to be in excess of

$10,000,000,000.00 (TEN BILLION DOLLARS).

7. That on behalf of plaintiffs the defendants each be held and required to pay plaintiffs damages for violation of the Lanham Act and irreparable harm and damage in an amount not now known, but believed to be in excess of $10,000,000,000.00 (TEN BILLION DOLLARS). (a) That the defendants NBC UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC., DREAMWORKS INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOX FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES, and their directors, officers, writers, screenwriters, agents and all other persons in active concert or privity or in participating with them, be enjoined from, directly or indirectly from infringing Plaintiffs copyright in the Motion Picture Industry or any other industry relating to film to cease and desist from continuing to exercise any of the copyright rights with respect to Plaintiffs copyright of said screenplay "The Tenant" and/or "The Dysfunctionals" (b) That defendants NBC

UNIVERSAL, INC., UNIVERSAL PICTURES COMPANY, INCORPORATED., UNIVERSAL STUDIOS, INC., UNIVERSAL STUDIOS LLC., UNIVERSAL CITY STUDIOS LLLP., UNIVERSAL CITY STUDIOS, INC., UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, DREAMWORKS, L.L.C., DREAMWORKS L.L.C. d/b/a DREAMWORKS SKG, DREAMWORKS PRODUCTIONS LLC, DREAMWORKS, INC., TRIBECA PRODUCTIONS INC., AMY SAYRES, NANCY TENENBAUM FILMS INC., NANCY TENENBAUM, TWENTIETH CENTURY FOC FILM CORPORATION, EVERYMAN PICTURES, JAY ROACH, JAY ROACH D/B/A EVERYMAN PICTURES, and their directors, officers, screenwriters, agents, servants, employees and all other persons in active concert or privity or in participating with them, be enjoined from, directly or indirectly, infringing Plaintiffs copyrighted screenplay or continuing to exercise any of the copyright rights with respect to Plaintiffs copyrighted screenplay.

8. That each of the Defendants be required to deliver for the destruction of original and copies or duplications of any work infringing Plaintiffs copyright "The Tenant" and/or "The Dysfunctionals".

9. That the defendants be required to account for all gains, profits and advantages derived from their acts of wrongful infringement and wrongful authorizations.

10. That the plaintiffs be entitled to an accounting

from defendants wrongful conduct.

11. That the plaintiffs have an award for actual damages and any profits attributable to the Defendants wrongful infringements and authorizations of Plaintiffs copyright screenplay "The Tenant" and/or The Dysfunctionals".

12. That said judgment require an award requiring Defendants to pay Plaintiff Statutory damages.

13. That said judgment require an award requiring Defendants to pay Plaintiffs Punitive damages.

14. That the plaintiffs have judgment against Defendants for cost and attorneys fees.

15. That the Court grant such other and further relief as the court deems just and proper.

Dated:June 16th, 2005 /s/ Joseph Ardito

Joseph Ardito – Pro Se
150 William Street 19th, Floor
New York, New York - 10038
Tel. No. (917) 435-2820

(a) Certificate of Copyright Registration: "The Tenant" and/or "The Dysfunctionals" TXu000742462 / 1996-05-15

Type of Work: Text
Registration Number / Date: TXu000742462 / 1996-05-15
Application Title: The dysfunctionals.
Title: The tenant.
Description: 122 p.
Notes: Novel.
Copyright Claimant: Joseph C. ***Ardito***
Date of Creation: 1996

Names: Ardito, ***Joseph*** C.

(b) Certificate of Copyright Registration: "The Tenant" and/or "The Dysfunctionals"
TXu000775750 / 1996-12-24

Type of Work: Text
Registration Number / Date: TXu000775750 / 1996-12-24
Application Title: The dysfunctionals.
Title: The tenant.
Description: 176 p.
Notes: Fiction.
Copyright Claimant: Joseph C. ***Ardito***
Date of Creation: 1996
Previous Registration: Prev. reg. 1996, TXu 742-462.
Basis of Claim: New Matter: revisions & additions.

Names: Ardito, ***Joseph*** C.

(c) Certificate of Copyright Registration: "The Tenant" PAu002380629 / 1999-02-02

Type of Work: Dramatic Work and Music; or Choreography

Registration Number / Date: PAu002380629 / 1999-02-02

Title: The tenant.

Description: 128 p.

Notes: Screenplay.

Copyright Claimant: Joseph C. ***Ardito***

Date of Creation: not given on appl.

Authorship on Application: Chivalry Film Productions (employer for hire of Vincenzo T. ***Ardito,*** 1930-; script: ***Joseph*** C. ***Ardito.***

Previous Registration: Prev. reg. 1996 et al.

Basis of Claim: New Matter: editing, revisions.

Names: Ardito, ***Joseph*** C., 1956-
Ardito, Vincenzo T., 1930-
Chivalry Film Productions

(d) Certificate of Copyright Registration: "The Tenant" PAu002423720 / 1999-07-19

Type of Work:	Dramatic Work and Music; or Choreography
Registration Number / Date:	PAu002423720 / 1999-07-19
Title:	The tenant.
Description:	140 p.
Notes:	Screenplay.
Copyright Claimant:	Joseph C. ***Ardito***
Date of Creation:	not given on appl.
Previous Registration:	Prev. reg. 1995, TXu 742-462 et al.
Basis of Claim:	New Matter: revisions, editing & additions.
Names:	Ardito, ***Joseph*** C.

(e) Certificate of Copyright Registration: "The Tenant" PAu002283460 / 1998-04-27

Type of Work: Dramatic Work and Music; or Choreography

Registration Number / Date: PAu002283460 / 1998-04-27

Title: The tenant.

Description: 1 v.

Notes: Screenplay.

Copyright Claimant: Joseph C. ***Ardito***

Date of Creation: 1998

Previous Registration: Portions prev. reg. 1996, TXu 775-750 et al.

Basis of Claim: New Matter: compilation, revisions.

Names: Ardito, ***Joseph*** C.

RETAINER

TO: ROBERT J. EPSTEIN, ESQ.
150 William Street, 19 Floor
New York, New York 10038

The Undersigned, residing/with a business address of 150 William Street, 19th, Floor, New York, New York 10038. hereby retains you to prosecute or adjust a claim for damages arising from – personal injuries, breach of contract and copyright infringement sustained by JOSEPH ARDITO and CHIVARLY FILM PRODUCTIONS and property damage, breach of contract and copyright infringement to JOSEPH ARDITO AND CHIVALRY FILM PRODUCTIONS on the 6th day of October, 2000 through the present and continuing into the future through the negligence and/or intentional conduct and/or breach of contract and/or violation of copyrights laws and/or copyright infringement of NBC Universal, INC., Tribeca Productions, GE and/or those persons and/or entities related to the writing, filming, editing, production, release, publication, creation, distribution of and.or release of the films "Meet the Parents and/or "Meet the Fockers" and/or other persons and/or entities, and the undersigned hereby gives you the exclusive sight to take all legal steps to enforce the said claim.

In consideration of the services rendered and to be rendered by you, the undersigned hereby agrees to pay you and you are authorized to retain out of any moneys that may come into your hand by reason of the above claim:

(i) 15 per cent on the first 100,000,000.00 of the sum recovered

(ii) 10 per cent on any amount over 100,000,000.01 of the sum recovered;

ANY AND ALL ATTORNEYS FEES AWARDED BYTHE COURT AGAINST DEFENDING PARTIES SHALL BE DEDUCTED FROM ABOVE PERCENTAGES RECOVERED*.

Such percentages shall be computed on the net sum recovered after deducting for the amount recovered expenses and disbursements for expert testimony and investigative or other services properly chargeable to the enforcement for the claim or prosecution of the action . In computing the fee, the costs as taxed, including interest upon a judgment, shall be deemed part of the amount recovered. For the following or similar items there shall be no deduction in computing such percentages: liens, assignments or claims in favor of hospitals, for medical care and treatment by doctors and nurses, or self insurers or insurance carriers.

The Undersign understand (s) that this retainer is taken subject to the investigation of the facts by Robert J.Epstein, Esq. will not prosecute any appeal of an order of judgment which in the opinion of Robert J.Epstein, Esq. lacks merit.

Dated: 05/13/05

/s/ Joseph Ardito
JOSEPH ARDITO

Joseph Ardito
97-12 76th Street
Ozone Park, New York 11416
Tel. 917-435-2820

September 8, 2006

Certified Return Receipt & Regular Mail

Robert J. Epstein
Attorney at Law
150 William Street, 19th Floor
New York, New York 10038

Re: 05 civ. 5627(GEL) (DF)
Chivalry Film Productions and Joseph Ardito, Individually v. NBC INC., et al.

Dear Mr. Epstein:

Please be advised and let this letter serve as **Notice** that any **Retainer Agreement** regarding any type of agreement between Mr. Robert J. Epstein – Attorney-at-Law and Joseph Ardito in respect to the above civil proceedings, be held void, invalid and rescinded due to a conflict of interest and the intentional sabotaging of this plaintiff's case.

Respectfully,

/s/ Joseph Ardito
Joseph Ardito

Plaintiffs: Chivalry Film Productions
and Joseph Ardito
Individually

97-12 76th Street
Ozone Park, New York
11416
Tel. 917-435-2820

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